

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NENAD M. KOSTIĆ,

Plaintiff,

v.

TEXAS A&M UNIVERSITY AT
COMMERCE,

Defendant.

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Civil Action No. 3:10-cv-02265-M

DECLARATION OF BRIAN P. SANFORD

I, Brian P. Sanford, declare under penalty of perjury and state as follows:

1. My name is Brian P. Sanford. I am over the age of eighteen (18) years, of sound mind, and fully capable of making this Declaration. I am fully competent to testify to the matters stated in this Declaration, of which I have personal knowledge, and all of which is true.

2. As an undergraduate student and law student at Southern Methodist University from 1979 to 1986, I worked year round for Law Offices of Windle Turley, first as a college clerk and then as a law clerk. I assisted Windle Turley, John Howie, Fred Misko, Sylvia Demarest, Craig Smith, and others in personal-injury trials. I received a J.D. degree from Southern Methodist University Dedman School of Law in 1986, and received a license from the state of Texas in 1986. Before practicing law, I already had seven years of significant experience behind the scenes in trial law.

3. I joined the commercial firm of Wesner, Coke, Boyd, & Clymer, P.C., in 1986, and left voluntarily to start my own practice in 1989. Since then I helped found three separate law firms in the Dallas legal market. I recently formed The Sanford Firm, which is my own firm.

4. I have been certified by the Texas Board of Legal Specialization in labor and employment law since 1996 and in civil trial law since 2003. Of the approximately 16,000 Texas Bar members practicing in Dallas now, only about 200 or 1.2 percent are board certified in labor and employment law, and only about 175 or 1.1 percent are certified in civil trial law. Double specialization is extremely rare. Only a handful of Texas attorneys are board-certified in both labor and employment law and civil trial law.

5. I am immediate past president of Texas Employment Lawyers Association (TELA), and I remain a member of its board. TELA is a professional bar organization of about 150 lawyers throughout the state of Texas who mostly represent employees. My predecessors as TELA presidents are: Margie Harris, Ken Molberg, and Kathy Butler. My successor as TELA president is Susan Motley. I have had the privilege to work as co-counsel with Hal Gillespie, Margie Harris, Barry Hersh, and other eminent colleagues.

6. I have made presentations at continuing legal education (CLE) seminars, and have written various legal education articles. The following recent presentations are typical of many others: *Cross Examination*, TELA Annual Spring Seminar, San Antonio, 2015; *The First Thirty Days: Plaintiff's Perspective*, State Bar of Texas, 25th Annual Labor Law Institute, San Antonio, 2014; and *Fighting Balkanization of Evidence*, TELA Annual Fall Seminar, Costa Rica, 2012.

7. I am an active member of the National Employment Lawyers Association (NELA), and a board member of its local affiliate, DFW-NELA. I am a moderator for a national listserv for select employment trial lawyers. I am also an active member of the Labor and Employment Sections and the Litigation Sections of the American Bar Association, the State Bar of Texas, and the Dallas Bar Association (DBA). I am a member of the Professionalism Committee of the Dallas Bar Association and a mentor in the DBA Transition to Law Program.

8. I am a member of the American Association for Justice, the Texas Trial Lawyers Association, the Dallas Trial Lawyers Association, the Federal Bar Association, and the Bar Association for the Fifth Circuit.

9. A lifelong resident of Dallas County, Texas, I practice primarily in Dallas. I have handled employment cases throughout Texas, and in Oklahoma, Louisiana, Arkansas, Tennessee, Indiana, and New York. I regularly appear in state and federal, trial and appellate courts.

10. I represent some businesses. Mostly, however, I represent individuals of various backgrounds and incomes in their civil-rights actions. I have experience with class actions. I am as proud of a \$60,000 jury verdict on behalf of a single mother, as I am of a \$5.5 million jury verdict on behalf of oil-and-gas investors.

11. A few representative cases showing my involvement in employment, civil rights, and civil trial are:

In re McClendon, 765 F.3d 501, 504 (5th Cir. 2014) *cert. denied* 135 S. Ct. 1403, 191 L. Ed. 2d 361 (2015);

Royal v. CCC & R Tres Arboles, L.L.C., 736 F.3d 396 (5th Cir. 2013); and

Arkoma Basin Exploration Co. v. FMF Associates 1990-A, Ltd., 249 S.W.3d 380 (Tex. 2008).

12. Many attorneys in Dallas and throughout Texas refuse to represent individuals in employment civil-rights cases because of difficult facts, complex law, and procedural obstacles. Suing government agencies as employers is especially challenging.

13. Nenad Kostić's lengthy action involves a formidable defendant, voluminous evidence, numerous witnesses, and complicated legal issues. I consider it an honor to represent Dr. Kostić, an accomplished scientist and academic. Proud of his U.S. citizenship, he withstood

false accusations, disciplinary investigations, threats by his supervisors, police actions, suspension from teaching, expulsion from campus, and dismissal from a tenured full professorship. My understanding is that dismissal from a tenured full professorship is a very rare event in U.S. academia. Dr. Kostić lost his career upholding the law.

14. At the beginning of this case in 2010, Ashley E. Tremain was my associate in my firm at the time, SanfordBethune. Ms. Tremain won academic honors at Washington University School of Law, received her J.D. degree in 2008, and became licensed in Texas in 2008. While she worked on this case under my supervision from November 2010 to June 2011, my firm regularly and customarily billed her work at an hourly rate of \$225 to fee-paying clients. Ms. Tremain has since built a successful independent career, has been speaking at professional meetings, and has become recognized in the profession. I understand from her declaration filed with this motion that her current rate is \$350 an hour.

15. My current associate, David N. Norris, has been working on this case continuously since October 5, 2011. After a lengthy career as an engineer, Mr. Norris enrolled in Southern Methodist University Dedman School of Law. After serving as an Articles Editor of the *SMU Law Review*, he received a J.D. degree, cum laude, and Order of the Coif in 2011. The state of Texas licensed him to practice law on November 4, 2011. Mr. Norris is an active member of TELA, NELA, American Bar Association, and Dallas Bar Association.

16. For work of the kind that Mr. Norris performed in this case for four weeks before licensure, my firm regularly and customarily charged his time at the hourly rate of \$100 to fee-paying clients. Since Mr. Norris became licensed, my firm (first SanfordBethune, then The Sanford Firm) has regularly and customarily been charging his time at the hourly rates of \$150 to \$250.

17. Throughout this case, all three of my firm's timekeepers (Ms. Tremain; her successor, Mr. Norris; and I) have adhered to the firm's ordinary practice. All of us have contemporaneously been recording time to a tenth of an hour with electronic time-keeping programs that mark when work begins and ends, and all of us have been describing our work. My firm's time-keeping entries are contained in Exhibit 2 to the motion for fees and costs. I have carefully reviewed Exhibit 2, and affirm that the entries constitute a true and correct billing record of the time lawyers at my firm spent on this case.

18. I exercised billing judgment by making the reductions explicitly shown in Exhibit 2. As lead counsel, I have been making every reasonable effort to avoid overlap between my work and that of my associates. For a while in 2011, I worked on the case alone, without an associate. I have been appropriately delegating to my associates – a single associate at any time – the tasks suitable for their skills and experience, to avoid overcharging for my higher-priced time. On many occasions when I conferred about this case with Ms. Tremain or Mr. Norris, only one of us billed for the time. I have been exercising billing judgment by keeping duplicative time out of billed time.

19. I exercised billing judgment in additional ways that are only indirectly evident in Exhibit 2. I refrained from billing for work that was similar to, or overlapped with, other work for which I billed. For example, Exhibit 2 shows my taking 16 depositions of 14 witnesses and defending five depositions of three witnesses. The depositions occurred on 14 nonconsecutive days over a period of five and a half months, and on one day during trial. I recorded only a part of the time I spent preparing for the depositions.

20. I exercised billing judgment in ways that are not evident in Exhibit 2. I refrained from recording some of the time I productively spent on this case. For example, I recorded only a

fraction of the time I spent communicating with Dr. Kostić by email, over the telephone, and face-to-face. Our communications were pertinent to this case and useful to me, but nonetheless I have reduced by 50 percent the time David Norris and I spent in one-on-one conferences with our client.

21. My firm's lawyers generally delegate non-lawyer tasks to a paralegal, and clerical tasks to a legal assistant less experienced than a paralegal. In keeping with my firm's practice, however, the time spent by the paralegal and legal assistants is not recorded. My firm treats their services as part of overhead, not charged to either clients or defendants. In this case, paralegal services consisted of sorting, reviewing, and producing more than 4,200 pages of documents; sorting and reviewing more than 6,300 pages of documents produced by defendant; preparing exhibits for depositions and trial; organizing focus groups and mock trial; helping with demonstrative exhibits on large poster boards; and more. Clerical services consisted of corresponding with witnesses and experts; making schedules; and more.

22. Dr. Kostić played an active role in litigating this case. He has been helping my firm with voluminous facts and documents, sharing ideas, preparing exhibits for depositions and trial, and performing other paralegal and clerical tasks. He has been doing all this work under my supervision. Dr. Kostić's assistance reduced the hours necessary for our firm to represent him in this case.

23. The core of this case, the common feature of Dr. Kostić's claims, was that he opposed unlawful conduct, participated in its investigation, and suffered retaliation because of his opposition and participation. Dr. Kostić's Title VII claim overshadows the other claims. All of Dr. Kostić's acts protected by Title VII are protected also by the First Amendment. Almost all of the statements protected by Title VII are also protected by the First Amendment. By

succeeding on his claim for Title VII retaliation, Dr. Kostić succeeded on almost all parts of his dismissed claim for First Amendment retaliation.

24. Although the property due process claim was dismissed, I extensively used defendant's procedural abuses and violations of the law and its own policies and procedures as evidence for pretext. The jury must have accepted my evidence in giving its verdict. The liberty due process claim was dismissed, and I did not use it in trial, but this claim constituted a sliver of the case. The defamation claim rested on undisputed evidence – a single memorandum, dated and signed by the alleged defamer. I spent very little time in discovery, and even less time in trial, on the defamation claim. The dismissed claims did not prevent Dr. Kostić from prevailing on the primary cause of action based upon the core facts of his lawsuit.

25. A judgment of over \$536,000 is a significant success. The damages for the claims overlapped identically with regard to lost wages and benefits, the only substantive damages awarded. The success would likely not have been different had damages been awarded for the dismissed claims.

26. I am requesting compensation for myself and my firm's other timekeepers at the following rates:

Brian P. Sanford:	\$650/hour	for work since November 2010,
David B. Norris:	\$250/hour	for work since October 2011,
David B. Norris:	\$100/hour	for work before October 2011, and
Ashley E. Tremain:	\$225/hour	for work from November 2010 to June 2011

The rates for Mr. Norris and myself are consistent with the current rates that my firm charges fee-paying clients for our time. My associates and I have been working on this case for nearly five years, but it is permissible to request payment in a fee motion at higher rates rather than at

historical rates. *Missouri v. Jenkins*, 491 U.S. 274, 283-84 (1989). Ms. Tremain has submitted her own declaration attesting to her current rate of \$350/hour. Due to the substantial increase in her rate from 2010-2011, I have decided that it is prudent to request compensation for her work at her prevailing rate for 2010-2011.

27. I invited three other lawyers unaffiliated with my firm to help me and Mr. Norris on three occasions for limited purposes. I have known these colleagues for years. I respect them for their professional skills and litigation performance. I know their high reputation. Amy E. Gibson and Barry S. Hersh ably helped with jury selection. Mr. Hersh ably helped also with mock trial. Robert E. McKnight, Jr. has been helping TELA members prepare their motions for fees and costs; he ably helped on this motion as well. They performed at their best in this case.

28. I reviewed the time for which Ms. Gibson and Messrs. Hersh and McKnight requested compensation in their separate declarations and any attachments. The work of these three lawyers did not duplicate that of any other lawyer working on the case. Their work was reasonably necessary to enable me, as lead counsel, to represent Dr. Kostić.

Amy E. Gibson:	\$450/hour,
Barry S. Hersh:	\$450/hour, and
Robert E. McKnight, Jr.:	\$495/hour.

29. Having spent my career in the Dallas legal market, I am active in local bar associations, and I know lawyers' hourly rates for labor and employment cases. Skills, experience, and reputation of each of these lawyers merit the hourly fees they are requesting.

30. In the attachment to this Declaration, I apply a rudimentary, universally-accepted statistical/mathematical method to objectively determine my hourly fee in this case. *See* Michael

Thome and Martin Giesen, *Statistics for the Behavioral Sciences*, 4th edition, McGraw-Hill Education, 2002.

31. The table in the attachment shows 11 fee awards made by three federal judges in the Dallas Division of the Northern District of Texas and three state judges in three district courts for Dallas County. These 11 items are a subset of the set shown in David Wiley's declaration and in our motion for fees and costs. Recipients of these 11 fee awards are ten TELA members (Hal K. Gillespie appears twice), attorneys representing employees in employment cases. These awards reflect employment-law practice in the Dallas legal market from 2010 to 2015, the same years over which this case has been litigated. Five fee awards went to lawyers having more years of experience than me, and six awards to lawyers having fewer years of experience than me.

32. Because the length of my experience falls in the middle of the data set, the set is valid; extending the data set to include lawyers much less experienced than me would compromise the statistical/mathematical treatment. Each pair of numbers in the table, and each corresponding data point in the graph, relates years since the J.D. degree at the time of the award with the hourly fee awarded.

33. The median experience of the ten lawyers at the time of the award is 25 years, and the median fee is \$550 per hour. Because I have 29 years of licensed experience, my fee should exceed the median fee; \$600 would be reasonable on this basis alone. Because I have been board-certified in labor and employment law for 19 years, in civil trial law for 12 years, my fee should exceed the median fee by a larger amount. This argument supports the reasonableness of an award of \$650 per hour.

34. The straight line shown in the attachment to my Declaration is the best fit of the data using the accepted method of least squares. Michael Thome and Martin Giesen, *Statistics*

for the Behavioral Sciences, 4th edition, McGraw-Hill Education, 2002. As expected, the hourly fee is roughly proportional to the length of experience, but data points are scattered about the line. The scatter is expected and can be easily explained: an attorney's performance does not depend solely on years of experience. An attorney's rate depends also on knowledge and ability that may be separate from years of experience.

35. According to the plot, experience of 29 years (on the horizontal axis) corresponds to a typical TELA member's hourly fee of \$600 per hour (on the vertical axis). Based upon years of experience alone, \$600 per hour would be reasonable. Because of my double certification and abilities, an increment of \$50 per hour is reasonable. My election as TELA president while litigating this case is some evidence of those recognized abilities.

36. An hourly fee of \$650 would be the fifth highest of 12 awards to TELA members – 11 fees in the data set plus that fee. The fifth position in a set of 12 lies somewhat above the median, a fair statement of my standing among my accomplished colleagues. A fee of \$650 per hour would remain below the rate awarded to Charla Aldous, Russell W. Budd, and Hal K. Gillespie.

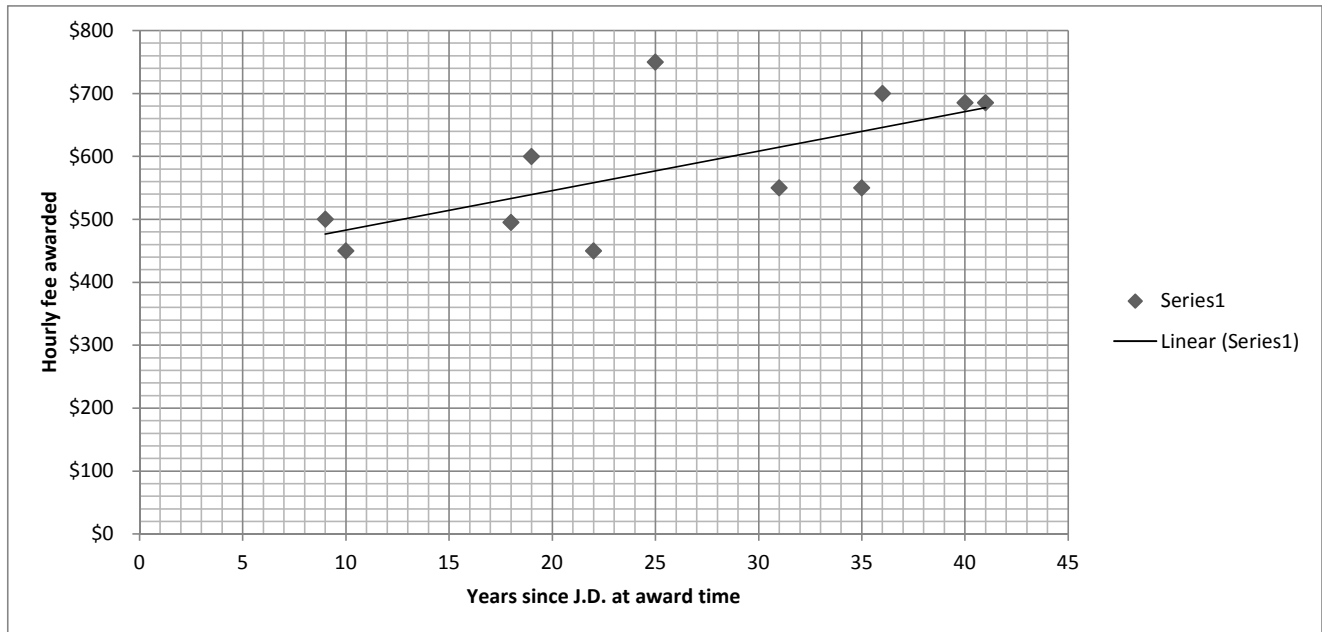
37. The final tally of my firm's work hours, after all reductions, is shown in Exhibit 3. Ms. Gibson and Messrs. Hersh and McKnight document their work hours in Exhibits 5, 6 and 7. The sum of these work hours – the bottom line – accounts for the work necessary for the proper prosecution of this matter.

38. Dr. Kostić has paid, directly or indirectly, costs that are recoverable as part of the reasonable attorney's fee; a small part of these costs are also recoverable as part of the bill of costs under 28 U.S.C. § 1920. All of the costs are itemized on Exhibit 3, and those that are also recoverable as parts of the bill of costs are itemized on the bill of costs, which is part of Exhibit

3. All of the costs on Exhibit 3 were necessary for the proper prosecution of this matter. My firm and other law firms in Dallas legal market would normally bill these and similar costs to a fee-paying client.

I hereby declare under penalty of perjury that the foregoing is true and correct and within my personal knowledge. Executed on September 17, 2015.

/s/ Brian P. Sanford
Brian P. Sanford



Years at award time	Fee rate awarded	TELA lawyer	Judge and court
25	\$750	Charla Aldous	Hon. Jane Boyle, NDTX
36	\$700	Russell W. Budd	Hon. Jane Boyle, NDTX
40	\$685	Hal Gillespie	Hon. Kenneth Molberg, 95th Dist. Ct.
41	\$685	Hal Gillespie	Hon. Reed O'Connor, NDTX
19	\$600	Matthew R. Scott	Hon. Phyllis Lister Brown, 162nd Dist. Ct.
31	\$550	John E. Wall	Hon. Kenneth Molberg, 95th Dist. Ct.
35	\$550	Yona Rozen	Hon. Reed O'Connor, NDTX
9	\$500	Brian P. Lauten	Hon. Jane Boyle, NDTX
18	\$495	J. Derek Braziel	Hon. Jane Boyle, NDTX
10	\$450	Joe Gillespie	Hon. Ed Kinkeade, NDTX
22	\$450	Robert Lee	Hon. Eric Moyé, 14th Dist. Ct.

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Plaintiff's Motion for Reasonable Attorneys' Fees and Costs

EXHIBIT 2:
THE SANFORD FIRM'S TIME ENTRIES
(WITH TIMEKEEPER TOTALS, SEGMENT BREAKDOWN,
& BILLING JUDGMENT REDUCTIONS)

Date	Time-Keeper	Description	Time	Phase
11/4/2010	BPS	Received and examined emails from N. Kostic re representation.	0.20	Investigation & Pleadings
11/8/2010	BPS	Conference with Kostic re claims (1.00); reviewed client documents (0.30); prepared complaint (1.00); received and examined several emails from Kostic (0.10); conference with AET re complaint (0.10).	2.50	Investigation & Pleadings
11/8/2010	AET	Reviewed original complaint and revised same (0.30); conference with client re same (0.30); prepared civil cover sheet and designation of lead counsel (0.30); conference with BPS re case facts (0.40).	1.30	Investigation & Pleadings
11/10/2010	BPS	Received and examined emails from Kostic.	0.20	Investigation & Pleadings
11/11/2010	BPS	Received and examined emails from Kostic.	0.20	Investigation & Pleadings
11/12/2010	BPS	Received and examined emails from Kostic (0.10), and telephone conference with Kostic re complaint and due process hearing (0.40).	0.50	Investigation & Pleadings
11/16/2010	BPS	Received and examined email and reviewed client documents.	0.20	Investigation & Pleadings
11/23/2010	BPS	Received and replied to emails from Kostic re amended complaint.	0.10	Investigation & Pleadings
12/16/2010	AET	Exchange emails with opposing counsel re extension of time to respond to motion to dismiss (Doc. 9)(0.10), prepared motion to extend (0.40), and discussed motion with BPS (0.10).	0.60	Case Management

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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P. Appx. 014

Date	Time-Keeper	Description	Time	Phase
12/17/2010	AET	Revised motion for extension (Doc. 9) (0.30); conferred with BPS re same (0.10).	0.40	Case Management
12/17/2010	BPS	Received and examined long email from Kostic (0.10); conference with AET re motion for extension (0.10); revised draft of motion for extension (0.30).	0.50	Case Management
12/20/2010	BPS	Received and examined order re scheduling conference (Doc. 10) and order granting extension (Doc. 11) (0.20); exchanged emails with Kostic re pre-trial schedule (0.20).	0.40	Case Management
1/4/2011	BPS	Received and examined emails from Kostic re claims.	0.20	Trial Preparation
1/7/2011	BPS	Reviewed brief in support of motion to dismiss (Doc. 8) (0.30); reviewed Kostic emails and telephone conference with Kostic re claims (0.40); preparation of appeal letter to J. Todd, and exchange of emails re same (0.80).	1.50	Dispositive Motions
1/11/2011	AET	Exchanged emails with opposing counsel re Rule 26 conference.	0.20	Case Management
1/18/2011	BPS	Reviewed order re scheduling conference (Doc. 10) (0.10); exchanged emails with J. Todd re scheduling conference (0.10).	0.20	Case Management
1/19/2011	BPS	Received draft of joint report on scheduling order (Doc. 12) and conferred with J. Todd re same.	0.20	Case Management
1/25/2011	BPS	Work on draft of joint report, with emails to J. Todd and Kostic re same.	0.80	Case Management

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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P. Appx. 015

Date	Time-Keeper	Description	Time	Phase
2/1/2011	AET	Prepared motion for second unopposed extension (Doc. 13) and conferred with BPS re same.	0.40	Case Management
2/1/2011	BPS	Finalized AET's draft of motion (Doc. 13) and conference with AET re same.	0.50	Case Management
2/2/2011	AET	Conferred with BPS re motion to extend and filed same.	0.20	Case Management
2/9/2011	AET	Researched and drafted response to motion to dismiss (Doc. 16) (4.50); reviewed letter from Kostic with information for response and conferred with BPS re same (0.20).	4.70	Dispositive Motions
2/11/2011	BPS	Received and examined second motion to dismiss (Doc. 15) and conferred with AET re same.	0.40	Dispositive Motions
2/13/2011	AET	Telephone conference with BPS and Kostic.	1.50	Dispositive Motions
2/13/2011	BPS	Worked on AET's draft of response (Doc. 16), conferred with AET and Kostic re same, and exchanged emails with Kostic re same.	2.00	Dispositive Motions
2/14/2011	AET	Researched and drafted response to second motion to dismiss (Doc. 19), and conferred with BPS and Kostic re same.	1.00	Dispositive Motions
2/14/2011	BPS	Worked on AET's draft of response (Doc. 16), conferred with AET and Kostic re same, and exchanged emails with Kostic re same.	2.00	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
2/15/2011	AET	Exchanged email with client re motion to dismiss (Doc. 15).	0.20	Dispositive Motions
2/17/2011	BPS	Exchanged emails with J. Todd re both pending motions to dismiss (Docs. 7 & 15).	0.50	Dispositive Motions
2/22/2011	AET	Prepared motion for leave to amend complaint (Doc. 21) and emailed BPS re same.	0.40	Investigation & Pleadings
2/28/2011	BPS	Received and examined reply in support of first motion to dismiss (Doc. 18).	0.30	Dispositive Motions
3/31/2011	AET	Received and examined correspondence from client with fact list re amended complaint.	0.30	Investigation & Pleadings
4/1/2011	AET	Conferred with BPS re first amended complaint (Doc. 23).	0.20	Investigation & Pleadings
4/11/2011	AET	Drafted first amended complaint and conferred with BPS re same.	5.10	Investigation & Pleadings
4/12/2011	BPS	Re first amended complaint, reviewed existing pleadings and conferred with AET re draft, and telephone conference with Kostic re same (0.50); reviewed AET's draft and telephone conference with Kostic re complaints and existing answer (0.50).	1.00	Investigation & Pleadings
4/15/2011	AET	Continue research and drafting of first amended complaint, and conferred with BPS re same.	2.80	Investigation & Pleadings

Date	Time-Keeper	Description	Time	Phase
4/16/2011	BPS	Received and examined emails from Kostic and AET re issues re draft of complaint (0.20); reviewed AET's draft of first amended complaint (.3)	0.50	Investigation & Pleadings
4/18/2011	AET	Exchanged emails with client re first amended complaint.	1.10	Investigation & Pleadings
4/19/2011	AET	Exchanged emails with client re first amended complaint.	0.40	Investigation & Pleadings
5/16/2011	BPS	Received and examined emails from Kostic re drafting issues of amended complaint (0.10); conference with AET re revisions to first amended complaint (0.40).	0.50	Investigation & Pleadings
5/17/2011	BPS	Revised AET's draft of first amended complaint (0.50); conferred with AET re re amended complaint issues (0.30).	0.80	Investigation & Pleadings
5/18/2011	BPS	Continued revision of AET's draft of complaint (0.80); conferred with AET re same (0.20).	1.00	Investigation & Pleadings
5/19/2011	BPS	Continued revising draft of first amended complaint.	1.00	Investigation & Pleadings
5/20/2011	BPS	Conferred with AET re first amended complaint and motion for leave to file (Doc. 21).	0.20	Investigation & Pleadings
5/23/2011	AET	Final revisions to motion for leave and first amended complaint, and exchange emails with BPS re same before filing.	0.60	Investigation & Pleadings

Date	Time-Keeper	Description	Time	Phase
6/1/2011	AET	Exchange emails with client re first amended complaint.	0.20	Investigation & Pleadings
6/23/2011	BPS	Received and examined emails with Kostic re retrieval of belongings and computer from TAMUC.	0.20	Investigation & Pleadings
7/5/2011	BPS	Received and examined answer to first amended complaint and amended motion to dismiss (Docs. 28 & 29) (0.40); conferred with Kostic re same (0.20); conferred with RRS (paralegal) re case law (0.20).	0.80	Dispositive Motions
7/21/2011	BPS	Reviewed amended motion to dismiss and Kostic's comments re same.	0.50	Dispositive Motions
7/28/2011	BPS	Researched issues related to response to motion to dismiss (1.50); preparation of draft of portion of response to motion to dismiss (Doc. 33) (1.80); conferred with Kostic re same (0.20).	3.50	Dispositive Motions
7/29/2011	BPS	Reviewed and annotated motion to dismiss in preparation of response (1.00); reviewed and annotated amended complaint in preparation of response to motion to dismiss (1.00); researched issues related to response to amended motion (2.50); preparation of draft of response to motion to dismiss (3.50) edited and revised multiple drafts of response to motion to dismiss (Doc. 33) (1.50); conferred with Kostic re issues related to amended complaint and response to motion to dismiss (0.50).	10.00	Dispositive Motions
10/3/2011	BPS	Reviewed pleadings, discovery disclosures, and emails from Kostic.	0.40	Discovery

Date	Time-Keeper	Description	Time	Phase
10/4/2011	BPS	Telephone conferences with Kostic re discovery issues, in conjunction with receiving and examining emails from Kostic re discovery requests, responses, and document production.	1.00	Discovery
10/5/2011	DBN-LC	Reviewed 225 paragraphs of amended complaint, and amended answer (Docs. 23 & 29), to determine admissions (1.80); reviewed documents in preparation for later production (0.20).	2.00	Discovery
10/5/2011	DBN	Conference with BPS re important items of discovery in preparation of discovery requests (0.50); reviewed pleadings again in preparation of discovery requests (0.50); prepared preliminary draft of interrogatories (1.00); preparation of draft of requests for production (1.00).	3.00	Discovery
10/6/2011	BPS	Prepared first supplemental disclosures (0.50); reviewed emails from Kostic re discovery issues (0.10); prepared email to J. Todd re disclosures and depositions (0.10); prepared letter to J. Todd re Kostic's office, lab, and computer (0.30).	1.00	Discovery
10/6/2011	DBN-LC	Conference with BPS re additions to discovery requests (0.50); reviewed pleadings in preparation of discovery requests and prepared/revised interrogatories and requests for production (2.50); telephone conference with Kostic re items for discovery requests (0.50).	3.50	Discovery
10/7/2011	DBN-LC	Telephone conference with Kostid re discovery requests (0.50); edited and revised draft interrogatories and requests for production based upon conferences with BPS and Kostic (2.00).	2.50	Discovery
10/7/2011	DBN-LC	Conference with BPS on interrogatories and requests for production.	0.50	Discovery

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

Date	Time-Keeper	Description	Time	Phase
10/7/2011	BPS	Reviewed court scheduling order (Doc. 37) and prepared prepared Notice of Potential Trial Conflict (Doc. 38) (0.70); received and examined email from Kostic re scheduling order (0.10); finished letter and email to J. Todd re lab, office, and computer (0.20).	1.00	Case Management
10/11/2011	DBN-LC	Reviewed Kostic's comments on discovery requests and edited same.	0.50	Discovery
10/18/2011	DBN-LC	Additional editing of discovery requests in light of Kostic's comments.	0.50	Discovery
10/19/2011	DBN-LC	Revised, edited, and proofed interrogatories after conferences with BPS and Kostic (0.50); revised, edited, and proofed requests for production after conferences with BPS and Kostic (1.80); conference with BPS re discovery request edits and additions (0.30); conference with Kostic re discovery request edits and additions (0.80).	3.40	Discovery
10/21/2011	DBN-LC	Conference with Kostic re discovery plan and key documents.	0.50	Discovery
10/26/2011	BPS	Received and examined court order (Doc. 39).	0.20	Case Management
10/26/2011	BPS	Reviewed and revised second amended complaint (Doc. 40) (1.50); preparation of email to Kostic re draft of second amended complaint (0.10).	1.60	Investigation & Pleadings

Date	Time-Keeper	Description	Time	Phase
11/7/2011	BPS	Received and reviewed TAMUC policies re code of conduct and appeal process (0.20); reviewed and revised second amended complaint (Doc. 40) (0.30).	0.50	Investigation & Pleadings
12/6/2011	BPS	Reviewed and revised second amended complaint (Doc. 40).	1.50	Investigation & Pleadings
12/7/2011	BPS	Telephone conference with attorney for witness (Caruth) re facts, legal allegations, and strategy issue (1.00); preparation of memo re witness and legal issues (0.50).	1.50	Trial Preparation
12/7/2011	BPS	Telephone conference with J. Todd re discovery and pleading issue (0.30); telephone conference with Kostic re discovery and pleading matters (0.50).	0.80	Discovery
12/8/2011	BPS	Examined amended complaint (Doc. 23) for comparison in drafting second amended complaint, and client documents for confirmation of facts in second amended complaint.	0.50	Investigation & Pleadings
12/9/2011	BPS	Received and examined draft of second amended complaint from DBN and Kostic to work toward finalizing over 60 pages of facts and legal issues.	0.50	Investigation & Pleadings
12/13/2011	BPS	Reviewed and revised second amended complaint (Doc. 40) (0.80); telephone conference with Kostic re revisions (0.20).	1.00	Investigation & Pleadings
12/13/2011	DBN	Final proofreading and editing of second amended complaint, with redlining of first amended complaint in order to have a complete comparison.	1.40	Investigation & Pleadings

Date	Time-Keeper	Description	Time	Phase
12/16/2011	DBN	Researched privilege status of company emails (1.50); conference with client re scanning of discovery documents (0.30).	1.80	Discovery
12/16/2011	BPS	Examined email and documents from Kostic supporting allegations of second amended complaint.	0.50	Investigation & Pleadings
12/20/2011	BPS	Received and examined email and discovery responses from Kostic (0.20); prepared discovery responses (0.70).	0.90	Discovery
12/20/2011	BPS	Received and examined court order re advising court (Doc. 41).	0.10	Case Management
12/22/2011	DBN	Prepared responses to defendant's discovery requests.	2.30	Discovery
12/23/2011	BPS	Continued preparing discovery responses (0.50); conference with DBN re discovery responses (0.10).	0.60	Discovery
12/23/2011	DBN	Completed assembling and editing discovery responses, including conference with BPS.	2.50	Discovery
1/3/2012	BPS	Compared second amended complaint to motion issues in light of TAMUC's advisory (Doc. 42) (0.50); telephone conference with Jim Sanford re claims (0.40); received and replied to email from Todd (0.10).	1.00	Dispositive Motions
1/9/2012	BPS	Telephone conference with Todd re discovery issues (0.20); received and examined three orders (Docs. 43, 44 & 45) (0.20); email Kostic re discovery and orders (0.10).	0.50	Discovery

Date	Time-Keeper	Description	Time	Phase
1/11/2012	BPS	Received and examined answer to second amended complaint (Doc. 46).	0.40	Investigation & Pleadings
1/11/2012	DBN	Reviewed answer to second amended complaint (Doc. 46).	0.50	Investigation & Pleadings
1/27/2012	BPS	Reviewed emails and plaintiff's document production to defendant.	0.20	Discovery
2/3/2012	BPS	Email correspondence with Todd re standing order and discovery dispute re computer (0.10); reviewed discovery issues and Magistrate Judge Standing Order On Non-Dispositive Motions re procedures for conferences and joint status reports on discovery issues (0.20).	0.30	Discovery
2/7/2012	BPS	Email correspondence with Todd (0.10); reviewed draft of joint status report on computer issue (Doc. 48-1) (0.10); confer by email and email with Kostic status report (0.30).	0.50	Discovery
2/8/2012	BPS	Preparation of Plaintiff's portion for joint status report re discovery dispute and briefing for Magistrate Judge (Doc. 48-1), including emails with J. Todd re same.	1.50	Discovery
2/8/2012	DBN	Drafted notice of appearance.	0.30	Case Management
2/8/2012	DBN	Drafted designation of expert witnesses (1.00); proofread draft of joint status report re return of computer (0.20).	1.20	Discovery

Date	Time-Keeper	Description	Time	Phase
2/9/2012	BPS	Telephone conference with Kostic re discovery issues (0.50); edit DBN's draft designation of expert witnesses (0.30); received and reviewed motion to compel (Doc. 48) (0.20).	1.00	Discovery
2/9/2012	DBN	Drafted second supplemental initial disclosures (0.80); reviewed defendant's motion to compel return of property (Doc. 48) (0.10); conference with BPS re motion to compel (0.20).	1.00	Discovery
2/15/2012	BPS	Reviewed motion to compel (Doc. 48) in advance of hearing set for 2/17 (0.10); received and replied to email from Kostic (0.10); conference with DBN re motion and hearing on 2/17 (0.30).	0.50	Discovery
2/15/2012	DBN	Reviewed motion, researched, and prepared unfiled outline of response to be used at the hearing.	2.80	Discovery
2/16/2012	DBN	Continued research and drafting of argument against motion to compel.	7.00	Discovery
2/16/2012	BPS	Conduct research and other preparation for opposing motion to compel (2.00); conference with DBN re same (0.30); conference with Kostic re same (0.20).	2.50	Discovery
2/17/2012	BPS	Preparation for hearing on motion to compel (2.00); attend hearing on motion to compel (1.50).	3.50	Discovery
2/17/2012	DBN	Prepared for hearing (1.80); attended hearing (1.50).	3.30	Discovery

Date	Time-Keeper	Description	Time	Phase
2/20/2012	DBN	Researched and drafted preliminary versions of plea in abatement and motion for protective order in <i>Lemanski</i> case filed in retaliation against Kostic (2.00, reduced to 0.00).	0.00	<i>Lemanski</i>
2/20/2012	DBN	Listened to audio of 3/23/2010 Fullwood committee hearing to assess witnesses, procedures, and fairness.	2.00	Investigation & Pleadings
2/20/2012	BPS	Received and replied to emails (0.10); received and examined order denying motion to compel (Doc. 51) (0.20); conference with DBN re discovery issues (0.20).	0.50	Discovery
2/21/2012	BPS	Researched <i>Lemanski</i> issues re plea in abatement (0.30); conference with DBN re <i>Lemanski</i> issues (0.10). (0.40, reduced to 0.00.)	0.00	<i>Lemanski</i>
2/21/2012	DBN	Continued researching and drafting plea in abatement and motion for protective order (6.00, reduced to 0.00).	0.00	<i>Lemanski</i>
2/22/2012	DBN	Continued researching, drafting, and editing plea in abatement and motion for protective order (4.00); conference with BPS re same (0.20). (4.20, reduced to 0.00.)	0.00	<i>Lemanski</i>
2/22/2012	BPS	Preparation of letter to counsel re <i>Lemanski</i> case (0.20); email correspondence with Kostic (0.10); review and edit DBN's drafts of plea in abatement and motion for protective order (0.50). (0.80, reduced to 0.00.)	0.00	<i>Lemanski</i>
2/23/2012	DBN	Drafted response to requests for admissions.	1.50	Discovery

Date	Time-Keeper	Description	Time	Phase
2/23/2012	BPS	Reviewed and edited DBN's draft of response to request for admissions, and continued reviewing and editing of draft of motion to abate.	0.50	Discovery
2/23/2012	DBN	New editing of plea in abatement and motion for protective order in light of BPS's work on drafts (0.50, reduced to 0.00).	0.00	<i>Lemanski</i>
2/24/2012	DBN	Finalized response to request for admissions.	1.00	Discovery
2/29/2012	DBN	Conferred by email and phone with R. Loya re videotape of 3/23/2010 hearing.	0.50	Investigation & Pleadings
3/1/2012	DBN	Conference with BPS and N. Kostic re discovery, including computer hardware and depositions.	1.30	Discovery
3/1/2012	BPS	Telephone conference with J. Todd re discovery issues (0.10); reviewed discovery matters and client documents related to discovery responses (0.30); conference with Kostic and DBN re discovery issues (1.30); email to J. Todd re discovery issues (0.10).	1.80	Discovery
3/2/2012	BPS	Emails with Kostic re discovery responses (0.10); conference with DBN re discovery responses (0.10).	0.20	Discovery
3/2/2012	DBN	Drafted preliminary version of second interrogatories and second requests for production (1.00); drafted memo for file re computer issues (0.20).	1.20	Discovery
3/5/2012	DBN	Continued drafting second interrogatories and requests for production.	0.30	Discovery

Date	Time-Keeper	Description	Time	Phase
3/6/2012	BPS	Telephone conference with Todd re discovery issues (0.30); prepared email to Kostic re discovery issues (0.30); received and examined motion and proposed order (Doc. 52) (0.40).	1.00	Discovery
3/6/2012	DBN	Drafted agreed protective order (Doc. 78) (0.30); edited and revised second interrogatories and requests for production (1.00).	1.30	Discovery
3/13/2012	BPS	Telephone conference with J. Todd re request for production and other discovery issues (0.20); telephone conference with Kostic re request for production, additional interrogatories, and other discovery issues (0.50); email correspondence with Todd re discovery issues (0.10); email correspondence with Kostic (0.20).	1.00	Discovery
3/14/2012	BPS	Email communications with J. Todd re motion to modify scheduling order (Doc. 52) (0.10); email communications with Kostic re same (0.10)	0.20	Case Management
3/14/2012	BPS	Preparation of discovery requests.	0.30	Discovery
3/16/2012	BPS	Telephone conference with Kostic re documents to be included in discovery requests (0.60); exchange emails with J. Todd re issues related to document production (0.20).	0.80	Discovery
3/16/2012	DBN	Completed draft of supplementary disclosures, second interrogatories, and second RFPs (0.40); exchange emails with Kostic re drafts of discovery requests (0.10).	0.50	Discovery

Date	Time-Keeper	Description	Time	Phase
3/19/2012	BPS	Reviewed discovery documents and document production in preparation for discovery responses (0.20); conference with DBN re supplemental disclosures (0.20); received and replied to emails from Todd and from Kostic re supplemental disclosures and response to discovery requests (0.10).	0.40	Discovery
3/19/2012	DBN	Completed drafting secnd interrogatories and requests for production (1.80); preparation of email to Todd re corrected document production (0.20).	2.00	Discovery
3/20/2012	DBN	Drafted transmittal letter to opposing counsel re bates documents (0.20); preparation of document production in response to document requests (0.50); email exchange with Kostic re document production (0.10).	0.80	Discovery
3/20/2012	BPS	Exchange emails with counsel re document production request issues (0.10); email correspondence with Kostic re document production in response to requests for production (0.10); examined documents collected by DBN in response to production request (0.50); conference with DBN re document production (0.10).	0.80	Discovery
3/22/2012	BPS	Conference with Kostic and DBN re documents and background facts for marshaling key evidence for trial.	1.50	Trial Preparation
3/22/2012	BPS	Preparation for depositions of key witnesses for defendants (0.50); reviewed document production to defendants to determine important documents for depositions (0.50).	1.00	Discovery

Date	Time-Keeper	Description	Time	Phase
3/22/2012	DBN	Reviewed documents produced to defendants in preparation to determine key documents for deposition (2.00); conference with with Kostic re preparation for deposition of Fullwood (0.50);	2.50	Discovery
3/22/2012	DBN	Conference with Kostic and BPS re marshaling key evidence for deposition and trial.	1.50	Trial Preparation
3/23/2012	DBN	Reviewed additional client documents to determine responsiveness to requests for production.	0.50	Discovery
3/23/2012	BPS	Preparation for depositions; examined client documents.	1.50	Discovery
3/26/2012	DBN	Conference with Kostic re key documents and claims for depositions of key witnesses (1.50); conference with BPS and Kostic to prepare for deposition of Fullwod (0.50).	2.00	Discovery
3/26/2012	DBN	:reparation of draft of jury charge (1.00); researched jury charge issues (1.00).	2.00	Trial Preparation
3/26/2012	BPS	Preparation of jury charge (0.30); researched defamation and name clearing charge (0.20).	0.50	Trial Preparation
3/26/2012	BPS	Conference with Kostic and DBN re preparation for deposition of Fullwood.	0.50	Discovery
3/27/2012	BPS	Preparation for deposition of Fullwood by reviewing outlines and organizing exhibits (1.50); deposed Fullwood (3.00); preparation for McBroom deposition by reviewing outline and documents (1.50); deposed McBroom (1.50); conference with Kostic and DBN after depositions re depositions and discovery issues (0.50).	8.00	Discovery

Date	Time-Keeper	Description	Time	Phase
3/27/2012	DBN	Preparation for deposition of Fullwood by reviewing and selecting exhibits for depositions and assisting BPS with exhibits organization and review (3.00); attended deposition of Fullwood (3.00); preparation for McBroom deposition by assisting BPS in document and exhibit organization (1.00); attended McBroom deposition (1.50); conference with Kostic and BPS after depositions re depositions and discovery issues (0.50).	9.00	Discovery
3/28/2012	DBN	Reviewed campus police activity logs relevant to certain factual issues, and email Kostic re same.	0.20	Investigation & Pleadings
3/28/2012	BPS	Emails with Kostic re fact issues and depositions (0.20); emails with Todd re discovery issues (0.10); conference with DBN re discovery issues (0.20).	0.50	Discovery
3/29/2012	DBN	Conference with Kostic re production of documents and depositions.	0.40	Discovery
4/3/2012	DBN	Drafted response to second request for production (1.20); email with counsel re response to request for production (0.10); email exchange with opposing counsel to confirm date and time of Evans deposition (0.10); email with Kostic re deposition notes (0.10); phone call with Kostic re document production (0.40).	1.90	Discovery
4/4/2012	DBN	Organized and reviewed voluminous documents to be produced.	2.80	Discovery
4/5/2012	BPS	Preparation for depositions of Myers and McBroom (1.50); conference with Kostic and DBN re deposition questions (1.00).	2.50	Discovery

Date	Time-Keeper	Description	Time	Phase
4/6/2012	DBN	Preparation for depositions of Myers and McBroom by organizing exhibits (2.50); attended deposition of Myers to assist with knowledge of exhibits and timeline (3.50); attended second deposition of McBroom to assist with knowledge of exhibits and timeline (3.00); conference with BPS and Kostic after depositions re deposition answers (1.00).	10.00	Discovery
4/6/2012	BPS	Preparation for deposition of Myers by reviewing outlines and exhibits (0.50) deposited Myers (3.50); deposited McBroom for second time (3.00); conference with Kostic and DBN after depositions re discovery and trial strategy and issues (1.00).	8.00	Discovery
4/9/2012	BPS	Reviewed document production for selection of exhibits for deposition of Evans.	0.50	Discovery
4/9/2012	DBN	Reviewed document production and organized exhibits for Evans deposition (1.20); drafted letter to Michigan court reporter re procedure for deposition by Skype enclosing fax of exhibits (0.30).	1.50	Discovery
4/10/2012	DBN	Preparation for Evans deposition by assisting in drafting questions and outline for deposition (2.40); conference with Kostic re preparation for Evans deposition, review of voluminous documents for deposition exhibit selection, and to discuss issues related to future document requests, witnesses needed for depositions, and witnesses to be contacted for trial (2.00).	4.40	Discovery
4/10/2012	BPS	Preparation for deposition of Evans by reviewing outline and exhibits (0.50) deposited Evans (4.00); conference with Kostic re discovery issues (0.50).	5.00	Discovery

Date	Time-Keeper	Description	Time	Phase
4/13/2012	DBN	Researched issues related to retaliation (0.20) and exchanged emails with Kostic re same (0.10).	0.30	Investigation & Pleadings
4/20/2012	BPS	Email with Todd re discovery issues (0.10); email with Kostic re discovery issues (0.20); conference with DBN re discovery issues (0.20).	0.50	Discovery
4/21/2012	BPS	Conference with Kostic re to prepare for his deposition and deposition of Jang.	3.00	Discovery
4/24/2012	BPS	Preparation for Jang deposition by reviewing documents for exhibits and preparing outline.	2.00	Discovery
4/25/2012	BPS	Preparation for Jang deposition by reviewing outline and exhibits (1.00); deposed Jang (6.00); conference with Kostic re discovery issues and Brown deposition (0.50); preparation for Brown deposition by drafting outline (1.00).	8.50	Discovery
4/26/2012	BPS	Preparation for depositions of Brown and Ball (1.00); deposed Brown (2.50); attended deposition of Ball (1.00); conference with Kostic and DBN re deposition answers and discovery issues (0.50).	5.00	Discovery
4/26/2012	DBN	Assisted in organization and selection of exhibits for Brown and Ball depositions (2.00); conference with Kostic re exhibits and deposition questions (1.00); attended deposition of Brown to assist in knowledge of exhibits and timeline (2.50); attended deposition of Ball to assist in knowledge of exhibits and timeline (1.00); conference with Kostic and BPS re discovery issues (0.50).	7.00	Discovery

Date	Time-Keeper	Description	Time	Phase
5/1/2012	DBN	Preparation of receipt acknowledgment form for counsel to receive computer hardware as part of a response to a request to produce.	0.20	Discovery
5/1/2012	BPS	Conference with Kostic re preparation for his deposition (1.50); attended deposition of Kostic (7.00); conferences with Kostic and DBN re Kostic deposition and discovery issues (1.50).	10.00	Discovery
5/3/2012	BPS	Emails with Kostic re scheduling Peer deposition (0.10); email with Todd re scheduling Peer deposition (0.10).	0.20	Discovery
5/3/2012	DBN	Telephone conference with Kostic re trial witnesses (0.20) preparation of memo re trial witnesses (0.30).	0.50	Trial Preparation
5/9/2012	BPS	Examined Myers' deposition transcript.	0.50	Discovery
5/11/2012	BPS	Telephone conference with Todd re depositions and discovery matters; emails with Todd re discovery matters.	0.50	Discovery
5/15/2012	DBN	Researched issue of review and sign deadline for an adjourned deposition.	0.70	Discovery
5/16/2012	BPS	Received and examined motion on scheduling and proposed order (Doc. 54) (0.30); telephone conference with Todd re motion (0.10); email correspondence with Todd re motion and discovery issues (0.10).	0.50	Case Management
5/22/2012	DBN	Three phone calls attempting to locate witness AJ; reviewed notes re AJ in preparation for calls; researched via internet attempting to obtain a correct phone number for AJ.	0.60	Investigation & Pleadings

Date	Time- Keeper	Description	Time	Phase
5/23/2012	DBN	Phone call attempting to locate witness AJ.	0.10	Investigation & Pleadings
5/24/2012	BPS	Emails with Todd re scheduling of Kostic's second deposition (0.10); reviewed pleadings re response to Todd re scope of second deposition (0.10).	0.20	Discovery
5/30/2012	BPS	Received and examined document requests (0.10); email with Todd re supplementation of production of documents (0.10); examined document production for completeness (0.20); conference with DBN re discovery issues (0.10).	0.50	Discovery
6/25/2012	BPS	Telephone conferences with Kostic re discovery issues (0.20); email with counsel re Peer deposition (0.10); telephone with Todd re discovery issues (0.20); preparation for depositions (0.50).	1.00	Discovery
6/26/2012	BPS	Email with Kostic re trial witnesses, deposition sequence, and responding to discovery requests (0.20); conference with DBN re upcoming depositions (0.10); reviewed client documents and document production for selection of exhibits for depositions (0.20).	0.50	Discovery
6/27/2012	DBN	Email to Loya re videotape of TAMUC appeal hearing.	0.10	Investigation & Pleadings
6/27/2012	BPS	Conference with Kostic re preparation for deposition (1.00) attended deposition of Kostic (6.50); conference with Kostic after deposition re issues raised in deposition (0.50).	8.00	Discovery
6/28/2012	DBN	Reviewed RFP information from NK.	0.20	Discovery

Date	Time-Keeper	Description	Time	Phase
6/29/2012	DBN	Preparation of Plaintiff's Third Request for Production (0.70); email to Kostic re request for production (0.10); telephone call to Kostic re request for production (0.20).	1.00	Discovery
6/29/2012	BPS	Preparation of plaintiff's Third Request for Production.	1.00	Discovery
7/2/2012	BPS	Preparation of response to defendant's third request for production (0.40); conference with DBN re preparation of response to request for production (0.10).	0.50	Discovery
7/2/2012	DBN	Continued work on response to defendant's 3rd Request for Production: preparation of email to counsel re response to request (0.10), reviewed documents previously produced (0.40), two telephone calls with Kostic re response to document requests (0.20); email exchange with Kostic re document production issues (0.10).	0.80	Discovery
7/5/2012	BPS	Reviewed pleadings and scheduling orders to determine if modification needed (0.30); telephone conference with Kostic re motions, trial issues, and extending deadlines in scheduling order (0.20).	0.50	Case Management
7/6/2012	BPS	Conference with Kostic re preparation for deposition (2.00); attended Kostic's third deposition (3.00); conference with Kostic after deposition to discuss trial issues and issues raised in the deposition (1.00).	6.00	Discovery
7/9/2012	DBN	Preparation of joint discovery status report re discovery issue in format required by Magistrate Judge Kaplan (1.50); reviewed document production re compelling production (0.50); telephone call with Kostic re discovery disputes (0.50); conference with BPS re motion to compel and MSJ issues (0.50).	3.00	Discovery

Date	Time- Keeper	Description	Time	Phase
7/10/2012	DBN	Reviewed and edited requests for motion to compel; reviewed discovery documents re requests for motion to compel.	4.00	Discovery
7/11/2012	DBN	Reviewed and edited motion for summary judgment and declaration.	0.50	Dispositive Motions
7/15/2012	BPS	Telephone conference with Kostic re claims and discovery issues.	0.20	Discovery
7/15/2012	BPS	Preparation of motion for partial summary judgment.	0.80	Dispositive Motions
7/16/2012	DBN	Prepared exhibits and appendix for motion for summary judgment (1.50); proofread motion for summary judgment (0.30).	1.80	Dispositive Motions
7/16/2012	DBN	Email exchange with Kostic re document production issues.	0.20	Discovery
7/16/2012	BPS	Telephone conference with Todd re discovery issues (0.10); conference with DBN re discovery issues (0.10).	0.20	Discovery
7/16/2012	BPS	Preparation of motion for partial summary judgment.	0.30	Dispositive Motions
7/17/2012	DBN	Updated appendix for motion for summary judgment; drafted proposed order for motion for summary judgment.	2.00	Dispositive Motions
7/19/2012	BPS	Preparation of Motion for Partial Summary Judgment.	4.00	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
7/19/2012	DBN	Drafted deposition notice for Lemanski deposition.	0.10	Discovery
7/20/2012	BPS	Researched issues related to motion for summary judgment (1.50); preparation of Motion for Partial Summary Judgment (2.50); revised and edited multiple drafts of Motion for Partial Summary Judgment and Brief (2.00).	6.00	Dispositive Motions
7/20/2012	DBN	Final preparation of motion for summary judgment, brief, appendix, and proposed order.	1.00	Dispositive Motions
7/22/2012	DBN	Printed and sorted exhibits for the three upcoming depositions.	2.50	Discovery
7/23/2012	DBN	Drafted transmittal letter for judge's copies of motion for summary judgment documents.	0.20	Dispositive Motions
7/23/2012	BPS	Preparation of deposition outline and reviewed exhibits for deposition of Lemanski (1.00); deposed Lemanski (6.00).	7.00	Discovery
7/25/2012	BPS	Preparation of deposition outline and reviewed exhibits for deposition of Peer (2.00); attended deposition of Peer (5.00).	7.00	Discovery
7/27/2012	BPS	Preparation of deposition outline and reviewed exhibits for deposition of McKinney; (2.00); attended McKinney deposition (2.00); conference with Kostic re testimony in recent depositions and re remaining discovery issues in the case (2.00).	6.00	Discovery
7/30/2012	BPS	Received and examined Response to Motion for Partial Summary Judgment.	0.40	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
7/31/2012	DBN	Preparation of correspondence to counsel re document production.	0.20	Discovery
7/31/2012	BPS	Received and examined discovery responses and privilege log; conference with DBN.	0.30	Discovery
8/6/2012	BPS	Received Defendants' amended discovery response and supplemental discovery response; conference with DBN.	0.30	Discovery
8/8/2012	DBN	Telephone calls with Kostic re deposition changes and exhibits for Jones deposition (.40); telephone call to court reporter re extension for deposition changes (.10).	0.50	Discovery
8/9/2012	BPS	Preparation of deposition outline and reviewed exhibits for deposition of Jones (2.00); deposed Jones (6.00).	8.00	Discovery
8/10/2012	BPS	Conference with DBN re depo changes; reviewed depo changes.	0.40	Discovery
8/13/2012	BPS	Reviewed discovery; preparation of letter re return of discovery; conference with DBN re discovery.	0.50	Discovery
8/13/2012	DBN	Made edits and filed Reply to Def's Response to Motion for Partial Summary Judgment.	0.50	Dispositive Motions
8/20/2012	DBN	Emailed Kostic examples of expert report, disputed facts table in preparation for resp to mtn for summary judgment.	0.30	Dispositive Motions
8/21/2012	DBN	Emailed Kostic questions and comments re motion to compel.	0.20	Discovery

Date	Time-Keeper	Description	Time	Phase
8/22/2012	DBN	Reviewed document production and worked on draft of motion to compel.	1.50	Discovery
8/29/2012	BPS	Preparation of joint discovery brief and status report (1.80); emails with Jim Sanford re information related to Jones's statement (0.10).	1.90	Discovery
8/29/2012	BPS	Received and examined supplemental disclosures (0.10); conference with DBN re disclosures (0.10).	0.20	Discovery
8/30/2012	DBN	Edited motion to compel document.	0.50	Discovery
8/30/2012	BPS	Preparation of Joint Status Report re Discovery issues and brief (2.00); researched discovery issues (0.80); conference with DBN re discovery issues (0.20).	3.00	Discovery
8/31/2012	BPS	Received and examined Defendants' Motion for Summary Judgment and Brief in Support.	1.00	Dispositive Motions
8/31/2012	DBN	Phone calls and email exchange with opposing counsel's office re joint status report.	0.20	Discovery
9/7/2012	BPS	Received and examined Order Vacating Referral (Doc. 64).	0.10	Case Management
9/7/2012	BPS	Conference with DBN re motions and discovery issues.	0.10	Discovery
9/17/2012	BPS	Preparation of Discovery Joint Status Report with Brief.	1.00	Discovery

Date	Time-Keeper	Description	Time	Phase
9/18/2012	BPS	Preparation of Joint Status Report regarding Discovery with brief (1.90); preparation of email to Todd re status report (0.10).	2.00	Discovery
9/21/2012	DBN	Drafted motion to extend time to respond to MSJ.	0.60	Case Management
9/21/2012	BPS	Revised and edited DBN's draft of motion to extend.	0.50	Case Management
9/24/2012	BPS	Received and examined defendant's response to plaintiffs motion to extend, and defendant's motion to abate trial (Docs. 66 & 67).	0.40	Case Management
10/6/2012	BPS	Conference with Kostic re motion for summary judgment issues (1.00); preparation of response to motion for summary judgment (5.00).	6.00	Dispositive Motions
10/7/2012	DBN	Began drafting appendix for motion to compel.	2.00	Discovery
10/7/2012	BPS	Conference with DBN re motion to compel and motion for protective order.	0.20	Discovery
10/8/2012	DBN	Continued drafting appendix for motion to compel by reviewing and selecting numerous deposition excerpts (3.00); drafted motion for protective order (0.80).	3.80	Discovery
10/8/2012	DBN	Telephone call to S. Lemanski re Hunt County lawsuit (<i>0.20, reduced to 0.00</i>).	0.00	<i>Lemanski</i>
10/8/2012	BPS	Reviewed discovery responses (0.30); emails with Todd re discovery issues and motion to compel (0.10); preparation of transmittal letter to Todd (0.10).	0.50	Discovery

Date	Time-Keeper	Description	Time	Phase
10/9/2012	DBN	Telephone call with client re motion to compel (0.20);continued work on motion to compel appendix (0.20).	0.40	Discovery
10/9/2012	DBN	Telephone call with S. Lemanski re dismissal of Lemanski lawsuit (<i>0.10, reduced to 0.00</i>).	0.00	<i>Lemanski</i>
10/10/2012	BPS	Preparation of Motion to Compel (.50); emails with counsel re agreement on damages discovery (0.20); telephone conference with Kostic re discovery issues and agreement on damages discovery (0.30).	1.00	Discovery
10/10/2012	BPS	Preparation of Response to MSJ.	2.00	Dispositive Motions
10/10/2012	DBN	Edit motion to compel; additions to appendix to motion to compel.	1.00	Discovery
10/11/2012	BPS	Preparation of Response to Motion to Abate (Doc. 70).	1.00	Case Management
10/12/2012	BPS	Preparation of motion to extend (Doc. 71).	0.30	Case Management
10/15/2012	BPS	Received and examined reply re motion to abate (Doc. 72) (0.30).	0.30	Case Management
10/15/2012	BPS	Preparation of motion for protective order (0.70); preparation of motion to compel and brief (2.00).	2.70	Discovery

Date	Time- Keeper	Description	Time	Phase
10/15/2012	DBN	Proofed final edits to motion for protective order (Doc. 73) (0.20); proofed edits of motion to compel and appendix (Docs. 74 & 75) (0.30); drafted proposed orders for two motions (0.20); email court re proposed orders (0.10).	0.80	Discovery
10/16/2012	DBN	Drafted third motion to extend (Doc. 76) and proposed order.	1.00	Case Management
10/16/2012	BPS	Edited DBN's draft of third motion to extend (Doc. 76).	0.30	Case Management
10/25/2012	DBN	Telephone call with Kostic re response to MSJ.	0.20	Dispositive Motions
10/26/2012	DBN	Two telephone calls with Kostic re appendix for response to MSJ; edited response to MSJ.	0.40	Dispositive Motions
10/27/2012	DBN	Prepared appendix for response to MSJ.	7.00	Dispositive Motions
10/28/2012	DBN	Preparation of portions of response to motion for summary judgment (4.00); conferences with BPS and Kostic re issues related to declarations, exhibits, and response to motion for summary judgment (1.00).	5.00	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
10/29/2012	DBN	Preparation of portions of response and brief to motion for summary judgment (2.50); researched issues related to response brief (1.00); reviewed depositions for evidence supporting response (2.50); preparation of declarations (2.50); reviewed document production for evidence supporting response (1.50).	10.00	Dispositive Motions
10/29/2012	BPS	Researched issues related to Response to Motion for Summary Judgment (2.50); preparation of portions of Response and Brief to Motion for Summary Judgment (7.50).	10.00	Dispositive Motions
10/30/2012	DBN	Researched issues related to response brief (2.00); reviewed deposition transcripts for evidence supporting response (2.50); preparation of declarations, appendices, exhibits, and deposition excerpts (2.50), proofing of citations (1.00); proofed and edited multiple drafts of response brief (2.00).	10.00	Dispositive Motions
10/30/2012	BPS	Researched issues related to response to motion for summary judgement (1.00); preparation of extensive declaration of Kostic (2.00); reviewed and revised selection of exhibits and deposition transcripts (1.50); preparation of complete draft of Response to Motion for Summary Judgment and Brief (2.50); revised and edited multiple drafts of response brief (2.00); reviewed and edited Appendices (1.00).	10.00	Dispositive Motions
11/16/2012	BPS	Telephone conference with Kostic re discovery and trial issues.	0.40	Discovery
11/19/2012	DBN	Drafted motion to extend (Doc. 93).	0.20	Case Management

Date	Time-Keeper	Description	Time	Phase
11/19/2012	BPS	Edited DBN's draft motion to extend.	0.30	Case Management
11/19/2012	BPS	Reviewed discovery documents, plaintiff's motion to compel and defendant's response (0.50); reviewed emails from Kostic re document production and motion to compel issues (0.10); preparation of reply to response to motion to compel (1.50); telephone conferences with Kostic re document production issues (0.30); conferences with DBN re reply to motion to compel (0.30).	2.70	Discovery
11/20/2012	DBN	Put together appendix in support of reply to response to motion to compel (Doc. 95).	2.00	Discovery
11/20/2012	BPS	Preparation of reply to response to motion to compel (Doc. 94) (2.00); preparation of appendix (Doc. 95) (1.00); conferences with DBN and Kostic re reply and appendix (1.00); researched timeliness of motion (0.30); researched correspondence and pleadings (0.20).	4.50	Discovery
11/28/2012	BPS	Received and examined Reply to Response to Motion for Summary Judgment (0.30); conference with DBN re reply (0.10).	0.40	Dispositive Motions
1/22/2013	BPS	Researched elements of Section 1983 claim (0.50); preparation of memo re elements of 1983 claim (0.30); prepare email to Kostic re elements and meeting (0.20).	1.00	Investigation & Pleadings
1/26/2013	BPS	Conference with Kostic re claims, trial issues, depositions, consultants, focus groups, and witnesses.	2.00	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
2/1/2013	BPS	Received and examined magistrate judge's Findings, Judgment, and Order (Docs. 100 & 101), and researched (0.50); researched <i>Staub</i> (0.20); conference with DBN re findings, conclusions, and research related to appeal/objection (0.30).	1.00	Dispositive Motions
2/4/2013	DBN	Researched deadline on objections to magistrate judge's recommendation.	0.10	Case Management
2/7/2013	DBN	Reviewed magistrate judge's recommendation (0.30); researched <i>Thornbrough</i> case and other issues related to appeal/objections (1.50); emailed Kostic case citations and excerpts re <i>Thornbrough</i> (0.10); telephone call to Kostic re filing appeal/objections (0.10).	2.00	Dispositive Motions
2/7/2013	DBN	Conference with BPS re objection to magistrate judge recommendation.	0.20	Dispositive Motions
2/8/2013	BPS	Closer review of recommendation on granting motion for summary judgment dismissing all of Kostic's claims with eye toward determining issues for objections to the district judge.	0.40	Dispositive Motions
2/8/2013	BPS	Exchange emails with Kostic re comments on magistrate judge's R&R.	0.20	Dispositive Motions
2/8/2013	BPS	Conference with DBN re Magistrate Order and proposed Objection (Doc. 102).	0.30	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
2/8/2013	DBN	Conference with BPS re objections to magistrate judge's recommendation (0.30); reviewed findings of fact and conclusions of law in preparation for drafting objections (0.30).	0.60	Dispositive Motions
2/10/2013	DBN	Reviewed order and findings of facts and conclusions of law to identify possible points of objection (0.50); conference with Kostic and BPS re objections to magistrate judge's recommendation to grant summary judgment (1.50); work with BPS on preparing a detailed outline of Objection to Magistrate order granting summary judgment (3.00).	5.00	Dispositive Motions
2/10/2013	BPS	Conference with Kostic and DBN re Objection to Magistrate Order Granting Summary Judgment (1.50); preparation with DBN of detailed written outline of Objection to Magistrate Order Granting Summary Judgment in conference with DBN (3.00).	4.50	Dispositive Motions
2/11/2013	DBN	Drafted argument re rubberstamping by decisionmaker for objection to magistrate judge's recommendation; researched issues re rubberstamping issue (Doc. 102).	2.00	Dispositive Motions
2/12/2013	BPS	Received and examined email from Kostic re comments to detailed outline of objections to magistrate's findings and conclusions (0.20); preparation of objections to magistrate judge's findings and conclusions granting summary judgment (0.80).	1.00	Dispositive Motions
2/15/2013	DBN	Researched each of the issues for objections to magistrate judge's recommendation (6.00); drafted portions of objections (4.00).	10.00	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
2/20/2013	DBN	Telephone call with J. Lynn's law clerk to inform him that we would file a reply (Doc. 104) to Def's response (Doc. 103) to our objections; reviewed Def's response to our objections (Doc. 103).	0.30	Dispositive Motions
2/26/2013	DBN	Retrieved from Westlaw and emailed various cases related to research to Kostic.	0.30	Dispositive Motions
3/2/2013	BPS	Preparation of reply to response to objection (Doc. 104) (5.00); conference with Kostic and DBN re reply (1.00).	6.00	Dispositive Motions
3/5/2013	BPS	Conference with Kostic re reply to objection (Doc. 104) (0.50); preparation of reply to objection (4.00).	4.50	Dispositive Motions
3/6/2013	BPS	Conference with Kostic re reply (Doc. 104) (1.00); finalize reply to response to objection to Magistrate Judge ruling (5.00).	6.00	Dispositive Motions
4/1/2013	BPS	Telephone conference with Kostic re court order (Doc. 105), motion to compel, and trial issues.	0.30	Dispositive Motions
4/1/2013	BPS	Conference with DBN re Court order, motion to compel, and trial issues.	0.20	Dispositive Motions
4/1/2013	BPS	Received and examined Order Granting in Part and Denying in Part the Objection to Summary Judgment recommendation.	0.20	Dispositive Motions
4/3/2013	BPS	Preparation of renewed motion to compel (0.20); conference with DBN re motion (0.10); email with Kostic re motion to compel (0.10); email with Todd re motion to compel (0.10).	0.50	Discovery

Date	Time-Keeper	Description	Time	Phase
4/3/2013	DBN	Drafted portions of renewed motion to compel.	0.50	Discovery
4/4/2013	DBN	Drafted vacation letter to the court (.30); emailed vacation letter to court (.10).	0.40	Case Management
4/4/2013	BPS	Received and examined renewed motion for summary judgment (0.20); conference with DBN re motion (0.10).	0.30	Dispositive Motions
4/8/2013	BPS	Received and examined Court Order re scheduling of Motion to Compel matter (0.10); email Todd re conference (0.10); email Kostic re order (0.10).	0.30	Case Management
4/12/2013	BPS	Reviewed emails and correspondence from Kostic; conference with Kostic re motion to compel issues.	1.50	Discovery
4/12/2013	BPS	Reviewed emails and correspondence from Kostic (0.20); conference with Kostic re motion to compel issues (0.30).	0.50	Discovery
4/15/2013	BPS	Emails with Todd re issues related to motion to compel (0.10) email with Kostic re issues related to motion to compel (0.10).	0.20	Discovery
4/16/2013	BPS	Emails with Todd re joint status report for motion to compel (0.10); reviewed motion to compel (0.20); telephone conference with Kostic re motion to compel (0.20).	0.50	Discovery
4/18/2013	BPS	Reviewed document production (0.50); preparation of joint report re motion to compel (Doc. 111) (0.30).	0.80	Discovery

Date	Time-Keeper	Description	Time	Phase
4/22/2013	DBN	Prepared appendices for joint status report.	1.00	Discovery
4/22/2013	BPS	Reviewed discovery responses and document production in preparation of renewed motion to compel via Joint Status Report (1.00); researched discovery issues related to motion to compel (1.50); preparation of renewed motion to compel vial Joint Status Report (2.00); emails with Kostic re Report (0.20); conferences with DBN re report (0.30).	5.00	Discovery
4/23/2013	BPS	Researched additional issues related to motion to compel (0.50); preparation of edits and revisions to drafts of motion to compel/ Joint Status Report (2.00); conference with DBN re Joint Status Report issues and edits (0.50).	3.00	Discovery
4/24/2013	DBN	Drafted transmittal letters to Fisher for judge's copies of joint status report filing and to Todd (0.20); reviewed video clips made part of document production (0.60).	0.80	Discovery
4/25/2013	DBN	Drafted motion to extend time to respond to second (renewed) motion for summary judgment (0.30); drafted proposed order (0.10); emailed proposed order to the court (0.10).	0.50	Case Management
4/26/2013	BPS	Preparation of response to Second MSJ (1.50); conference with DBN re response to Second MSJ research and drafting issues (0.50).	2.00	Dispositive Motions
5/2/2013	DBN	Drafted second motion to extend time to file response to second (renewed) motion for summary judgment (Docs. 108 & 121).	0.30	Case Management
5/3/2013	DBN	Proofed and edited second motion to extend time to respond to second (renewed) motion for summary judgment (0.10) drafted proposed order (0.10); emailed proposed order to the court (0.10).	0.30	Case Management

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time-Keeper	Description	Time	Phase
5/8/2013	BPS	Preparation of Response to Renewed Motion for Summary Judgment (1.00); researched issues related to response (1.00).(Doc. 127).	2.00	Dispositive Motions
5/9/2013	DBN	Reviewed additional video clips for production to opposing counsel.	0.60	Discovery
5/9/2013	DBN	Research cases re amending pleadings for use in response to MSJ (Doc. 127).	0.20	Dispositive Motions
5/9/2013	BPS	Researched issues related to Response to Renewed Motion for Summary Judgment (1.00); reviewed exhibits and deposition transcripts related to Response to Renewed Motion for Summary Judgment (1.80); preparation of draft of portions of Response to Renewed Motion for Summary Judgment (Doc. 127) (3.00); emails with Kostic re Renewed Motion for Summary Judgment (0.20).	6.00	Dispositive Motions
5/10/2013	DBN	Researched issues for response to 2nd (renewed) motion for summary judgment (Doc. 127).	0.80	Dispositive Motions
5/10/2013	BPS	Reviewed and selected documents to be included as exhibits in appendix (1.00); preparation of additional portions of Response to Renewed Motion for Summary Judgment (4.00); conference with DBN re response and appendix (.20); reviewed draft of appendix (.30) (Docs. 127 & 128); conference with Kostic re response and appendix (.50).	6.00	Dispositive Motions
5/10/2013	DBN	Prepared appendix for response to second (renewed) motion for summary judgment with extensive documents and deposition excerpts (Doc. 128).	3.00	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
5/11/2013	BPS	Researched additional issues related to Response to Renewed Motion for Summary Judgment (1.50); reviewed and edited Appendix (0.80); preparation of additional portions of Response to Renewed Motion for Summary Judgment (2.50) (Docs. 127 & 128); conferences with DBN and Kostic re response, appendix, and exhibits (0.50); researched immunity issues (0.70).	6.00	Dispositive Motions
5/11/2013	DBN	Prepared appendix including exhibits of documents and deposition excerpts for response to second (renewed) motion for summary judgment (2.50); mapped document numbers to appendix numbers in response draft (1.50); proofed and edited drafts of response to 2nd (renewed) motion for summary judgment (Doc. 128) (1.00).	5.00	Dispositive Motions
5/12/2013	BPS	Preparation of additional portions of drafts of Response to Renewed Motion for Summary Judgment (2.50) (Docs. 127 & 128); reviewed drafts of appendix with exhibits and deposition excerpts (0.50); conference with Kostic re response and appendix (1.00).	4.00	Dispositive Motions
5/12/2013	DBN	Proofed and edited draft of response to renewed MSJ.	1.00	Dispositive Motions
5/12/2013	DBN	Researched immunity issues in 1983 claim against university and individual defendants.	0.50	Dispositive Motions
5/13/2013	BPS	Revised and edited multiple drafts of Response to Renewed Motion for Summary Judgment (4.00); reviewed and finalized Appendix (Doc. 127) (0.50).	4.50	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
5/13/2013	DBN	Proofed and edited multiple drafts of response to motion for summary judgment.	2.00	Dispositive Motions
5/14/2013	DBN	Drafted transmittal letter to Fisher re response to motion for summary judgment and clarification (0.20); two telephone calls to Fisher re magistrate judge's copies (0.20).	0.40	Dispositive Motions
5/17/2013	BPS	Received and examine Motion to Strike (Doc. 129).	0.20	Dispositive Motions
5/21/2013	BPS	Received and examined Order referring Motion to Strike (Doc. 130); reviewed motion to strike (Doc. 129).	0.10	Dispositive Motions
5/22/2013	BPS	Received and examined 20 page Reply to Response to Renewed motion for summary judgment (0.80); examined and reviewed court orders re issues related to motion to strike (0.20); reviewed motion to strike (0.20); conference with DBN re responses (0.20); email with Kostic re motions, orders, and responses (0.10).	1.50	Dispositive Motions
5/29/2013	BPS	Preparation of Response to Motion to Strike (Doc. 133).	1.00	Dispositive Motions
5/29/2013	DBN	Drafted portions of response to motion to strike (Doc. 133).	0.60	Dispositive Motions
5/29/2013	DBN	Researched issues for response to motion to strike regarding additional evidence in response to a 2nd MSJ and additional evidence at trial (Doc. 133).	2.30	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
5/30/2013	DBN	Drafted transmittal letter to Fisher for judge's copy of response to motion to strike.	0.20	Dispositive Motions
6/12/2013	DBN	Reviewed magistrate judge's order on motion to compel (Docs. 137 & 138).	0.20	Discovery
7/3/2013	BPS	Received and examined order (Doc. 143) and conferred with DBN re order.	0.20	Trial Preparation
7/3/2013	BPS	Received and examined notice of supplemental authority (Doc. 142); researched <i>Nassar</i> .	0.50	Dispositive Motions
7/3/2013	BPS	Received and examined notice of supplemental authority (0.10); researched and examined case cited (0.40).	0.50	Discovery
7/3/2013	DBN	Conference with BPS re response to notice of supplemental authority re <i>Nassar</i> .	0.40	Dispositive Motions
7/8/2013	DBN	Researched, drafted, and filed response to notice of supplemental authority (Doc. 144).	1.00	Dispositive Motions
7/8/2013	BPS	Researched cases related to "but for;" preparation of Response to Notice of Supreme Court case (Doc. 144).	1.00	Dispositive Motions
8/2/2013	DBN	Drafted notice of supplemental authority (<i>Haverda</i>) (Doc. 145) (0.50); reviewed <i>Haverda</i> case (0.40); phone call to Kostic re the notice (0.20); email to BPS re the notice (0.10).	1.20	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
8/5/2013	DBN	Conference with BPS re notice of supplemental authority.	0.30	Dispositive Motions
8/5/2013	DBN	Researched qualified immunity issue of whether 5th circuit recognizes less than termination as clear violation in 1983 claims.	0.40	Dispositive Motions
8/5/2013	BPS	Conferences with DBN re <i>Haverda</i> case (0.20); examined <i>Haverda</i> case (0.20); telephone conference with Kostic re <i>Haverda</i> case (0.30); researched Section 1983 claims for retaliation and examples of "clearly established" violations (0.80).	1.50	Dispositive Motions
8/6/2013	BPS	Conference with DBN re Notice of recent decision and revised notice (0.10); additional research of Section 1983 retaliation cases related to "clearly established" violations (0.10); email with DBN re notice (0.10).	0.30	Dispositive Motions
8/6/2013	DBN	Edited and proofed notice of supplemental authority (<i>Haverda</i>).	0.40	Dispositive Motions
8/6/2013	BPS	Received and examined Response to Notice (0.10); researched qualified immunity case (0.20); conference with DBN re response (0.10); email Kostic re response and recent case cited by Defendants (0.10).	0.50	Dispositive Motions
8/14/2013	BPS	Reviewed correspondence and court order setting trial and pretrial deadlines (0.40); preparation of email to Todd re discovery issues (0.10).	0.50	Case Management
9/16/2013	DBN	Reviewed documents for production to defendants.	0.50	Discovery
9/17/2013	DBN	Reviewed video clips and other documents for production to defendants.	2.00	Discovery

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time- Keeper	Description	Time	Phase
10/1/2013	DBN	Reviewed documents and video production for defendants.	1.00	Discovery
10/2/2013	DBN	Emailed client re document production to defendants.	0.30	Discovery
10/7/2013	DBN	Drafted 3rd supplemental disclosures.	0.60	Discovery
10/10/2013	BPS	Attended jury focus group re Kostic case (0.80); conference with DBN re focus group comments (0.20).	1.00	Trial Preparation
11/4/2013	DBN	Reviewed documents for production.	0.40	Discovery
11/8/2013	BPS	Emails with Kostic re focus group and timeline (0.10); telephone conference with Kostic re focus group, timeline, and meeting with trial consultant (0.30); email with trial consultant (0.10).	0.50	Trial Preparation
11/15/2013	BPS	Telephone conference with Pat Montes re trial consulting issues (0.50); emails with potential volunteers re Montes trial preparation meeting (0.30); emails with Kostic re trial preparation meeting and consultant (0.20).	1.00	Trial Preparation
11/16/2013	DBN	Conference with Kostic, P. Montes, BPS, and other attorneys on trial strategy and witness preparation.	6.00	Trial Preparation
11/16/2013	BPS	Conference with Kostic, Pat Montes, DBN, and other attorneys re trial strategy and witness preparation.	6.00	Trial Preparation
11/18/2013	DBN	Conference with BPS re trial strategy and consulting session (0.50); preparation of document production (0.30) email to Todd re document production (0.10).	0.90	Trial Preparation

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time-Keeper	Description	Time	Phase
11/18/2013	BPS	Conference with DBN and PCJ (legal assistant) re trial consulting session (0.50); preparation of notes re trial preparation consulting session (0.20); email Kostic re notes (0.10).	0.80	Trial Preparation
12/5/2013	BPS	Attended jury focus group re Kostic case.	1.00	Trial Preparation
12/5/2013	DBN	Focus group discussion re Kostic case.	1.00	Trial Preparation
12/9/2013	BPS	Reviewed facts and causes of action in pleadings in preparation for drafting supplemental notice of authority (0.40); researched recent cases re supplemental authority (0.50); email with Kostic re supplemental authority (0.10); preparation of draft of supplemental notice of new authority (0.50).	1.50	Dispositive Motions
12/11/2013	BPS	Researched recent cases related to qualified privilege (1.00); revised supplemental notice (0.30); email with Kostic re cases (0.20).	1.50	Dispositive Motions
12/12/2013	BPS	Preparation of Motion for Trial (0.40); email with counsel re motion (0.10); email with Kostic re motion (0.10); reviewed calendar for conflicts (0.10); conference with DBN re Motion for Trial (0.10).	0.80	Case Management
12/12/2013	DBN	Reviewed focus group video (0.20); drafted transmittal letter to client re video (0.10).	0.30	Trial Preparation
12/12/2013	BPS	Revised and edited drafts of Second Notice of Authority (0.50); researched cases related to second notice (0.40); email with Kostic re Second Notice (0.10).	1.00	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
12/13/2013	DBN	Proofed and edited Second Notice of Supplemental Authority.	0.10	Dispositive Motions
12/13/2013	DBN	Proofed and edited motion to set trial date (0.10); drafted proposed order on motion to set trial date (0.10); emailed proposed order to the court (0.10).	0.30	Case Management
12/16/2013	BPS	Received and examined Response to Motion for Trial Date (0.10); emails with Kostic re response to motion (0.10); conference with DBN re remaining discovery issues (0.10).	0.30	Case Management
12/17/2013	BPS	Email with Kostic re remaining discovery issues (0.10); conference with DBN re remaining discovery (0.10).	0.20	Discovery
12/23/2013	BPS	Preparation of Reply to Motion to Set Trial Date (1.00); emails with Kostic re reply and remaining discovery issues (0.30); conference with DBN re reply and discovery issues (0.20).	1.50	Case Management
1/5/2014	BPS	Conference with Kostic and DBN re trial, witness, and remaining discovery issues (2.00); preparation of trial outline re claims, witnesses, exhibits, and order of proof (2.50).	4.50	Trial Preparation
1/6/2014	DBN	Reviewed focus group video.	0.40	Trial Preparation
1/17/2014	BPS	Received and examined extensive Findings and Recommendations of Magistrate (0.50); conference with DBN re Findings and Recommendations (0.20); telephone conference with Kostic re Findings (0.10)	0.80	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
1/21/2014	BPS	Emails with Todd re extension (0.10); received motion to extend (0.10); edited and revised response to motion (0.50); emails with Kostic re extension issues (0.10).	0.80	Case Management
1/21/2014	DBN	Drafted and filed response to Defendants' motion for extension to file objections.	0.50	Case Management
1/22/2014	BPS	Emails with Kostic re filing objections to findings and recommendations of Magistrate (0.10); conference with DBN re objections (0.10); received and examined court order re extensions. (0.10)	0.30	Case Management
1/27/2014	BPS	Reviewed extensive findings and conclusions to highlight, annotate, and determine objections (1.00); conference with DBN re objections to findings and conclusions (0.50); conference with Kostic and DBN re Opinion and Objections (0.50).	2.00	Dispositive Motions
1/28/2014	BPS	Emails with Todd re objections to findings and conclusions (0.20); conference with DBN re objections (0.20)	0.40	Dispositive Motions
2/4/2014	DBN	Researched issues related to objections to magistrate judge's recommendation re summary judgment (1.00); preparation of draft of part of objections to magistrate judge findings (1.00).	2.00	Dispositive Motions
2/5/2014	DBN	Continued drafting objections to magistrate judge's recommendation re summary judgment.	1.50	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
2/6/2014	DBN	Additional research related to objections (1.50); continued drafting portions of objections to magistrate judge's recommendation (7.00); conference with Kostic re draft of objections (1.00); conference with BPS re draft of objections (0.50).	10.00	Dispositive Motions
2/7/2014	DBN	Reviewed findings re objections (0.50); reviewed cross motions for summary judgment (1.50) continued drafting objections to magistrate judge's recommendation re summary judgment (4.00); conferences with BPS and client re objections drafts (1.50); revised and edited drafts of objections (2.50).	10.00	Dispositive Motions
2/10/2014	DBN	Emails to client re document production.	0.10	Discovery
2/11/2014	BPS	Examined objection filed by TAMUC to Magistrate Judge findings (0.30); conference with DBN re objection (0.20).	0.50	Dispositive Motions
2/15/2014	BPS	Reviewed Objections and Response to Objections (0.30); telephone conference with Kostic re response and reply issues (0.20).	0.50	Dispositive Motions
2/19/2014	BPS	Emails with Kostic re response to objections (0.10); conference with DBN re response (0.10).	0.20	Dispositive Motions
2/27/2014	DBN	Researched case law related to reply to Defendants' response to Plaintiff's objections to magistrate judge's recommendations (2.00); drafted portions of reply (1.00); edited and proofed drafts of reply (1.00).	4.00	Dispositive Motions
2/27/2014	BPS	Preparation of Reply to Response to Objection (Doc. 161).	2.00	Dispositive Motions

Date	Time-Keeper	Description	Time	Phase
3/3/2014	DBN	Prepared and produced to opposing counsel certified Dahlem documents.	0.30	Discovery
3/19/2014	DBN	Phone call with NK re Raul Loya email and documents to be produced.	0.20	Discovery
4/1/2014	BPS	Received and examined partial judgments (0.20) (Doc. 164 & 163); long telephone conference with DBN and Kostic re judgments and trial issues (0.80).	1.00	Dispositive Motions
4/1/2014	DBN	Long telephone conference with client and BPS re court's latest orders and strategy going forward.	0.80	Dispositive Motions
4/3/2014	DBN	Reviewed documents for production to opposing counsel (Kostic-3860 - 3903).	0.40	Discovery
4/8/2014	BPS	Email with Kostic re remaining discovery issues (0.10); conference with DBN re discovery and trial issues (0.20); examined MSJ exhibits for use at trial (0.20); conference with Kostic and DBN re discovery and trial issues (1.50).	2.00	Discovery
4/8/2014	DBN	Conference with BPS and Kostic re case strategy and trial preparation (1.50); conference with BPS re discovery and trial issues (0.20); reviewed MSJ exhibits and document production for selection of exhibits for trial (1.80).	3.50	Trial Preparation
4/10/2014	DBN	Reviewed documents for production (Kostic_3904-4014).	0.40	Discovery

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

Date	Time-Keeper	Description	Time	Phase
4/15/2014	BPS	Reviewed emails related to discovery and releases and conferred with DBN re medical releases (0.10); email with Todd re discovery and email with Kostic re discovery (0.10).	0.20	Discovery
4/16/2014	DBN	Emailed medical release forms to client for signature.	0.30	Discovery
4/17/2014	DBN	Revised and edited medical release forms after discussion with Kostic.	0.30	Discovery
4/22/2014	BPS	Emails with Kostic re trial and focus group issues (0.20); conference with DBN re trial and focus group issues (0.20).	0.40	Trial Preparation
4/23/2014	BPS	Preparation of correspondence to EEOC and TWC re document requests.	0.30	Discovery
4/23/2014	BPS	Email with Kostic re focus group issues	0.20	Trial Preparation
4/24/2014	BPS	Preparation for and attended Jury Focus Group.	1.00	Trial Preparation
4/24/2014	DBN	Discussed case with focus group.	1.00	Trial Preparation
4/25/2014	BPS	Email with Kostic re trial strategy (0.10); email with Ball re consulting (0.10); conference with DBN re trial strategy (0.10).	0.30	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
4/28/2014	BPS	Email with trial consultant re consulting guidelines (0.20); telephone conference with office of trial consultant re guidelines (0.10); email Kostic re trial consultant guidelines (0.20); reviewed trial consultant fee arrangement and guidelines (0.30).	0.80	Trial Preparation
5/2/2014	BPS	Email with Kostic re trial and consultant re required guidelines (0.10); reviewed consultant documents re guidelines (0.10); conference with DBN re trial and consultant issues (0.10).	0.30	Trial Preparation
5/6/2014	BPS	Email with Kostic re discovery and jury consultant (0.10); preparation of jury consultant form documents (0.80); conference with DBN re jury consultant and trial and discovery issues (0.10).	1.00	Trial Preparation
5/6/2014	BPS	Email with Todd re response to Kostic complaint (0.10); email with Kostic re discovery of complaint response (0.10); conference with DBN re discovery issues related to complaint response (0.10).	0.30	Discovery
5/22/2014	BPS	Preparation of correspondence to jury consultant re fee agreements (0.20)	0.20	Trial Preparation
5/22/2014	BPS	Email to Todd re discovery request (0.10); emails to Kostic re correspondence with Todd and Jury Consultant (0.20).	0.30	Discovery
6/6/2014	BPS	Emails with Kostic re discovery and trial (0.10); email with Todd re discovery and trial (0.10); conference with DBN re discovery and trial (0.10).	0.30	Discovery
6/13/2014	DBN	Phone call with client re medical records requests and other issues.	0.40	Discovery

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

Date	Time-Keeper	Description	Time	Phase
6/20/2014	DBN	Drafted and mailed medical records request to Caldwell.	0.30	Discovery
7/2/2014	DBN	Telephone call with client re research of case law (0.20); researched case law and emailed case law to Kostic (0.30).	0.50	Trial Preparation
7/7/2014	BPS	Preparation of Opening Statement (1.50); emails with Kostic re Opening Statement (0.20); reviewed fact summaries by Kostic (0.50); conference with DBN re facts and opening statement (0.30); emails with Todd re depositions (0.20).	2.70	Trial Preparation
7/8/2014	BPS	Emails with Todd re motion for trial (.10); preparation of motion for trial (1.30); emails with Kostic re motion for trial and preparation of opening statement for trial (0.10).	1.50	Case Management
7/14/2014	DBN	Reviewed focus group DVD.	1.00	Trial Preparation
7/18/2014	DBN	Completed forms and attachments required by trial consultants re claims, status, and issues.	0.70	Trial Preparation
7/19/2014	DBN	Travel to Durham, NC (3.00, <i>reduced to 1.50</i>); conference with BPS and Kostic re jury consultant and trial strategy issues (2.00).	3.50	Trial Preparation
7/19/2014	BPS	Travel to Durham, NC (3.00, <i>reduced to 1.50</i>); conference with Kostic and DBN re jury consultant and trial strategy issues (2.00).	3.50	Trial Preparation
7/20/2014	BPS	Conference with Kostic, DBN, and jury consultants (7.50); travel from Durham NC (3.00, <i>reduced to 1.50</i>).	9.00	Trial Preparation

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time-Keeper	Description	Time	Phase
7/20/2014	DBN	Conference with BPS, client, and jury consultants (7.50); travel from Durham, NC (3.00, <i>reduced to 1.50</i>).	9.00	Trial Preparation
7/21/2014	DBN	Reviewed portions of video of jury consultation.	1.30	Trial Preparation
7/22/2014	DBN	Reviewed additional portions of video of jury consultant meeting	0.80	Trial Preparation
7/24/2014	DBN	Reviewed additional portions of jury consultant meeting (0.30); telephone call to court reporter inquiring about transcription of DVD (0.20); drafted transmittal letter to court reporter for DVD (0.20).	0.70	Trial Preparation
7/28/2014	BPS	Emails with counsel re motion to continue and depositions (0.20); conference with DBN re discovery and trial issues (0.20).	0.40	Discovery
7/29/2014	BPS	Emails with Kostic re witnesses and deposition (0.20); email with counsel re deposition with notice of deposition (0.20); conference with DBN re discovery issues (0.20).	0.60	Discovery
7/30/2014	BPS	Email with Kostic re witnesses (0.10); conference with DBN re witnesses and trial issues (0.20).	0.30	Trial Preparation
8/4/2014	BPS	Telephone conference with treating expert.	0.20	Trial Preparation
8/4/2014	BPS	Received and examined Motion to Continue and Affidavit (0.20); email with Kostic re motion and witnesses (0.10).	0.30	Case Management

Date	Time-Keeper	Description	Time	Phase
8/5/2014	BPS	Telephone conferences with witnesses.	0.40	Trial Preparation
8/6/2014	BPS	Telephone conference with witness (0.20); emails with Kostic re witnesses and motion to continue (0.20).	0.40	Trial Preparation
8/8/2014	DBN	Reviewed video of consultant session with Malekpour and Ball.	0.30	Trial Preparation
8/8/2014	BPS	Emails with Kostic re deposition and discovery (0.20); conference with DBN re deposition and discovery (0.20).	0.40	Discovery
8/10/2014	BPS	Preparation of Response to Motion to Continue Trial.	1.50	Case Management
8/10/2014	BPS	Conference with Kostic re deposition and discovery issues (1.50).	1.50	Discovery
8/11/2014	DBN	Prepared appendix for response to motion to continue (0.50)	0.50	Case Management
8/11/2014	DBN	Pprepared and produced document production 4015 to 4103.	0.50	Discovery
8/12/2014	BPS	Attended deposition of Kostic.	4.00	Discovery
8/12/2014	DBN	Edited Kostic declaration (0.10); reviewed documents for production 4104 to 4208 (0.70); drafted transmittal letter to opposing counsel for document production (0.20).	1.00	Discovery

Date	Time-Keeper	Description	Time	Phase
8/12/2014	DBN	Preparation of appendix for response to motion to continue (Doc. 170) (0.10); proofed and edited response to motion to continue (Doc. 169) (0.20).	0.30	Case Management
8/12/2014	BPS	Conference with Kostic re deposition and trial issues.	2.50	Discovery
8/13/2014	BPS	Emails with Kostic re witness issues (0.20); reviewed notes regarding witnesses (0.20); telephone conferences with witness (0.20).	0.60	Trial Preparation
8/14/2014	BPS	Received and examined Reply to Motion to Continue and Appendix.	0.20	Case Management
8/18/2014	BPS	Conference with BDN re jury focus group issues (0.20); telephone conference with Kostic re trial and witness issues (0.30).	0.50	Trial Preparation
8/18/2014	DBN	Prepared Who Do You Know form for focus group.	0.50	Trial Preparation
8/19/2014	BPS	Received and examined court order (Doc. 173).	0.10	Case Management
8/19/2014	BPS	Reviewed costs for focus group (0.20); emails with Kostic re focus group and order (0.20); conference with DBN and RRS re focus group issues (0.20).	0.60	Trial Preparation
8/20/2014	DBN	Drafted supplemental disclosures (0.40); email to NK re disclosures (0.20).	0.60	Discovery
8/20/2014	BPS	Emails with Todd re depositions.	0.20	Discovery

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time- Keeper	Description	Time	Phase
8/20/2014	BPS	Conference with DBN re focus groups.	0.20	Trial Preparation
8/21/2014	BPS	Preparation of neutral statement for mock trial (1.2); conference with DBN re mock trial (0.20); emails with Kostic re mock trial and witnesses (0.10).	1.50	Trial Preparation
8/22/2014	DBN	Reviewed focus group forms and sequence with RS (0.30); edited Jang's statement (0.30).	0.60	Trial Preparation
8/22/2014	DBN	Edited 4th supplemental disclosures.	0.20	Discovery
8/22/2014	BPS	Email with Kostic re mock trial.	0.10	Trial Preparation
8/23/2014	DBN	Prepared rooms and equipment for mock trial (0.50); attended mock trial session (3.00); distributed and collected forms at mock trial (0.50).	4.00	Trial Preparation
8/25/2014	DBN	Reviewed portion of video of mock trial jury deliberations.	0.50	Trial Preparation
8/26/2014	DBN	Reviewed additional portion of video of mock trial jury deliberations (0.80); conference with Kostic completed jury forms (0.40).	1.20	Trial Preparation
8/27/2014	DBN	Reviewed completed mock trial jury forms (0.40); drafted transmittal letter Kostic re video of mock trial (0.30).	0.70	Trial Preparation
9/9/2014	BPS	Conference with Caldwell re notes and deposition (1.50); telephone conference with Kostic re depositions (0.20).	1.70	Discovery

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

Date	Time-Keeper	Description	Time	Phase
9/10/2014	DBN	Prepared Caldwell documents for production (0.30); preparation of correspondence to opposing counsel and client re document production (0.10).	0.40	Discovery
9/10/2014	BPS	Telephone conference with Dr. Gautam re deposition (0.20); preparation of fax to Dr. Gautam re deposition (0.10); long telephone conference with Dr. Gautam re notes and Kostic medical file (0.80); emails with Todd re depositions of Caldwell and Gautam (0.10).	1.20	Discovery
9/11/2014	BPS	Email with Kostic re witnesses and depositions (0.10); emails with witness re deposition (0.10); conference with DBN re depositions (0.20); email with Todd re depositions (0.10).	0.50	Discovery
9/12/2014	DBN	Conference with opposing counsel re selecting a mediator.	0.10	Settlement
9/12/2014	DBN	Conference with client and BPS re checklist for trial preparation.	0.80	Trial Preparation
9/12/2014	DBN	Reviewed Kostic's deposition transcript and changes by page/line numbers for accuracy.	0.60	Discovery
9/12/2014	BPS	Conference with Kostic re Caldwell deposition (0.80); conference with Caldwell re deposition (0.30); attended deposition of Caldwell (1.50); conference with Kostic re claims and trial issues (2.00); telephone conference with Gautam re deposition (0.20); attended deposition of Gautam (1.00)	5.80	Discovery
9/12/2014	BPS	Conference with Kostic and DBN re trial preparation issues.	1.00	Trial Preparation

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time-Keeper	Description	Time	Phase
9/15/2014	DBN	Reviewed documents (4229 to 4235) for production to Defendants (0.30); email Todd re document production (0.10).	0.40	Discovery
9/16/2014	BPS	Emails with Kostic re trial and witness issues.	0.20	Trial Preparation
9/18/2014	BPS	Emails with Kostic re trial and document issues.	0.20	Trial Preparation
9/19/2014	BPS	Email with Kostic re trial issues (0.10); telephone conference with Kostic re trial and document issues (0.70).	0.80	Trial Preparation
9/27/2014	BPS	Conference with Kostic re trial exhibits and evidence for trial.	3.00	Trial Preparation
9/29/2014	DBN	Reviewed document 4236 for production to Defendants (0.10); email to Todd re document production (0.10).	0.20	Discovery
10/1/2014	BPS	Received and examined deposition transcripts of treating providers.	0.30	Discovery
10/4/2014	BPS	Telephone conference with Kostic re trial issues (0.80); preparation of email to witness (0.20); examined trial documents, memos, and comments by Kostic (1.00)	2.00	Trial Preparation
10/7/2014	BPS	Conference with DBN re trial issues (0.20); telephone conference with Kostic re trial issues (0.20); preparation of letter to Dr. Shi (0.20).	0.60	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
10/8/2014	BPS	Researched El Paso process server (0.20); preparation of letter and subpoena to Dr. Shi (0.20); conference with DBN re service of subpoena (0.10);	0.50	Discovery
10/8/2014	BPS	Reviewed timeline and client documents in preparation for opening statement.	1.00	Trial Preparation
10/8/2014	BPS	Emails with Todd re mediation.	0.20	Settlement
10/9/2014	BPS	Reviewed timeline, notes, depositions, and exhibits (2.00); preparation of opening statement (2.50).	4.50	Trial Preparation
10/11/2014	BPS	Conference with attorneys re modifications to opening statement (1.00); reviewed discovery and notes for preparation of opening statements (1.50); preparation of opening statement (2.50).	5.00	Trial Preparation
10/12/2014	BPS	Reviewed discovery documents and notes in preparation for opening statement (2.50); preparation of opening statement (3.50).	6.00	Trial Preparation
10/13/2014	BPS	Preparation of opening statement (2.50).	2.50	Trial Preparation
10/13/2014	DBN	Preparation of updated records request to TWC (0.20); reviewed documents related to S. Korom (0.20).	0.40	Discovery
10/14/2014	BPS	Emails with Kostic re trial issues (0.20); conference with DBN re trial and witness issues (0.30).	0.50	Trial Preparation
10/15/2014	DBN	Reviewed documents 4237 to 4244 for production (0.20); email Todd re document production (0.10).	0.30	Discovery

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Date	Time-Keeper	Description	Time	Phase
10/15/2014	BPS	Telephone conference with witness (0.50); telephone conference with Kostic re witnesses and trial (0.40); conference with DBN re trial issues (0.30); examined document production (0.20); received email from witness (0.10); emails with Kostic re witnesses and trial (0.20).	1.70	Trial Preparation
10/16/2014	BPS	Preparation of long email to witness re trial issues (0.50); emails with other witness re trial (0.20); emails with Kostic re trial and witness issues (0.20); conference with DBN re witness and trial issues (0.20); researched motion to extend voir dire (1.00).	2.10	Trial Preparation
10/17/2014	BPS	Received email and documents from Kostic re opening statement (0.20); telephone conference with Kostic re opening statement and witnesses (0.20); conference with DBN re opening statement and witnesses (0.10).	0.50	Trial Preparation
10/17/2014	BPS	Emails with Todd and mediator.	0.10	Settlement
10/17/2014	BPS	Email witness re testimony.	0.20	Trial Preparation
10/18/2014	DBN	Reviewed opening statement and made comments.	0.90	Trial Preparation
10/22/2014	BPS	Email with Kostic re exhibits (0.20); preparation of Opening Statement (1.00).	1.20	Trial Preparation
10/23/2014	DBN	Preparation for jury research group session and conference with client in preparation for the sessions (2.00); moderated jury research session (2.00).	4.00	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
10/23/2014	BPS	Conference with Kostic re trial issues and focus group (2.50); conference with DBN re focus group (0.50).	3.00	Trial Preparation
10/24/2014	BPS	Emails with Kostic re focus group (0.20); conference with DBN re focus group (0.30); preparation of opening statement (2.00); reviewed client documents and exhibits (1.00).	3.50	Trial Preparation
10/25/2014	BPS	Reviewed exhibits, timeline, client notes, and jury consultant comments (2.00); preparation of Opening Statement (2.00).	4.00	Trial Preparation
10/27/2014	BPS	Reviewed Jury Questionnaire (0.20); emails with Kostic (0.10); conference with DBN re trial issues (0.20).	0.50	Trial Preparation
10/28/2014	BPS	Telephone conference with Kostic re trial issues (0.70); reviewed emails from Kostic (0.10); conference with DBN re trial issues and subpoenas (0.20).	1.00	Trial Preparation
10/29/2014	DBN	Drafted trial subpoenas.	0.70	Trial Preparation
10/30/2014	DBN	Drafted subpoena letters.	0.90	Trial Preparation
10/31/2014	DBN	Revised subpoena letters (0.20); conference with BPS re subpoena letters (0.10); emailed draft of subpoena letters to BPS for review (0.10).	0.40	Trial Preparation
10/31/2014	BPS	Emails with Kostic re trial issues (0.20); conference with DBN re witness letters (0.20); preparation of Opening Statement (1.00).	1.40	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
11/1/2014	BPS	Conference with Kostic re trial issues (2.00); preparation of Opening Statement (2.00).	4.00	Trial Preparation
11/3/2014	DBN	Conference with NK and BPS prior to mediation.	0.40	Settlement
11/3/2014	DBN	Edited subpoena letters.	0.20	Trial Preparation
11/3/2014	BPS	Conference with Kostic re mediation (1.00); attended mediation (3.00).	4.00	Settlement
11/3/2014	BPS	Conference with Kostic re witnesses, exhibits, opening statement, timeline, and demonstrative aids.	2.00	Trial Preparation
11/4/2014	DBN	Reviewed CD of focus group video.	0.30	Trial Preparation
11/5/2014	DBN	Drafted adverse witness trial subpoenas.	0.50	Trial Preparation
11/5/2014	BPS	Received and examined Supplemental Initial Disclosures.	0.20	Discovery
11/5/2014	BPS	Telephone conference with Kostic re trial issues (0.30); preparation of letters to witnesses re subpoenas (1.00); preparation of Opening Statement (1.50).	2.80	Trial Preparation
11/6/2014	DBN	Finished drafting 19 subpoena letters.	1.60	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
11/6/2014	BPS	Emails with Kostic re trial issues (0.20); emails with Todd re witnesses (0.20); telephone conferences with Kostic re trial issues (0.30); conference with DBN re trial issues (0.50); preparation of letters to witnesses regarding subpoenas (1.00).	2.20	Trial Preparation
11/7/2014	BPS	Emails with Todd re witnesses (0.20); preparation of letters to witnesses re trial subpoena (0.50); conference with DBN re trial subpoenas (0.50); telephone conference with Kostic re trial subpoenas and witnesses (0.50); conference with process server re trial subpoenas (0.30).	2.00	Trial Preparation
11/7/2014	DBN	Researched home addresses to determine mileage fees (0.80); calculated witness fees (0.30); edited subpoenas and subpoena letters (0.80).	1.90	Trial Preparation
11/8/2014	BPS	Conference Kostic re opening statement, demonstrative aids, documents, trial briefs, motion in limine, jury selection, closing statement, witness examination, and other trial issues (4.00); preparation of opening statement (1.0); email trial consultant re opening statement (0.20); conference with DBN re trial briefs (0.50); reviewed and prepared demonstrative aids (1.00); preparation of trial brief re pretext (0.50).	7.20	Trial Preparation
11/8/2014	DBN	Conference with BPS and NK re status and remaining tasks for trial (2.00); began drafting and researching trial brief on pretext (2.00).	4.00	Trial Preparation
11/9/2014	DBN	Continued researching pretext for trial brief.	2.00	Trial Preparation
11/9/2014	BPS	Conference with Kostic re exhibits, witnesses, and other trial issues (2.50); reviewed documents for selection as exhibits (1.00); preparation of draft of witness list (1.00).	4.50	Trial Preparation

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time-Keeper	Description	Time	Phase
11/10/2014	BPS	Conference with DBN re trial briefs (0.20); telephone conference with Kostic re witnesses (0.10); preparation of letter to McKinney re subpoena (0.20); reviewed order re deadlines (0.20); preparation of joint report regarding settlement conference (0.50); preparation of email to Kostic re witness and report (0.10); telephone conference with Todd re witnesses and pretrial order (0.50); telephone conference with Kostic re conversation with Todd and witnesses (0.20).	2.00	Trial Preparation
11/11/2014	BPS	Telephone conference with Kostic re witnesses and trial issues (0.30); conference with DBN re trial brief re pretext (0.30).	0.60	Trial Preparation
11/11/2014	DBN	Continued researching and drafting trial brief on pretext (3.00); drafted subpoena for Dr. Lloyd (0.20).	3.20	Trial Preparation
11/12/2014	BPS	Researched cases regarding stale accusations (0.80); researched cases regarding failure to investigate (0.80); preparation of Trial Brief Regarding Pretext (1.00).	2.60	Trial Preparation
11/13/2014	DBN	Drafted letters to witnesses re trial (0.40); researched adverse actions for Title VII retaliation for trial brief (1.30); drafted portion of trial brief re adverse actions (0.30); phone call with client re trial subpoenas (0.10).	2.10	Trial Preparation
11/13/2014	BPS	Telephone conference with Kostic re witnesses and trial issues (0.30); conference with DBN re witnesses (0.30); conference with DBN re Trial Brief Regarding Adverse Actions (0.30); telephone conference with witness re trial (0.30); telephone conference with Dr. Lloyd's office re trial (0.20); preparation of letter re subpoena and trial and schedule (0.20); telephone conference with re jury instructions, witnesses, exhibits, and stipulated facts (0.60); preparation of jury instructions (0.50).	2.70	Trial Preparation

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

Date	Time-Keeper	Description	Time	Phase
11/14/2014	DBN	Researched adverse action case law (2.50); drafted trial brief re adverse actions (0.50); emailed letter re trial to witness (0.10).	3.10	Trial Preparation
11/14/2014	BPS	Emails with Kostic re deposition and trial issues (0.30); telephone conference with Caldwell re trial (0.20); email with Caldwell re trial (0.10); received proofs of service of witnesses (0.10); preparation of opening statement (1.50).	2.20	Trial Preparation
11/14/2014	BPS	Received ADR summary.	0.10	Settlement
11/15/2014	BPS	Emails with Kostic re trial issues (0.20); preparation of pretrial documents (1.50); reviewed detailed outline of issues and proof (1.50); conference with Kostic re trial issues (4.00)	7.20	Trial Preparation
11/15/2014	BPS	Reviewed detailed outline of issues and proof (1.00); preparation of exhibit notebooks (1.00); reviewed foam boards (0.20); emails with Kostic re trial issues (0.10).	2.30	Trial Preparation
11/17/2014	BPS	Emails with David Ball re Opening Statement (0.20); emails with Todd re witnesses, pretrial order, and trial issues (0.80); preparation of proposed pretrial order (2.50); preparation of Witness List (1.50); preparation of Exhibit List (1.00); received and examined Defendants' Witness List (0.20); received and examined Defendants' Exhibit List (0.20); received and examined Designation of Depositions by Defendants (0.20); telephone conference with Kostic re pretrial filings and issues (0.30); preparation of Plaintiff's Designation of Deposition (0.50); telephone conference with David Ball and DBN re Opening Statement and trial issues (1.00).	8.40	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
11/18/2014	BPS	Reviewed Defendants' Exhibit List (0.20); emails with Kostic trial witnesses, exhibits, and other trial issues (0.30); email with Todd re Pretrial Order (0.10); reviewed witnesses and subpoenas yet to be served (0.40); conference with process server re service of subpoenas (0.20); received Order Confirming Trial Date (0.10); telephone conference with Kostic re trial date, witnesses, and exhibits (0.50); received and examined Judge's Jury Questionnaire (0.20).	2.00	Trial Preparation
11/19/2014	BPS	Reviewed detailed outline of issues and proof (1.50); preparation of Opening Statement (1.50); reviewed foam boards (0.30); emails with Hersh re Opening Statement (0.10); received and examined Motion to Quash Subpoena (0.20); telephone conferences with Kostic re witness and trial issues (0.40); preparation of email to Court Clerk re Motion to Quash (0.10); emails with Todd re motion and trial issues (0.20); received and examined proofs of service of subpoenas (0.10); conference with process server re subpoenas (0.20).	4.60	Trial Preparation
11/20/2014	DBN	Began drafting motions in limine (0.80); conference with BPS re motions in limine and trial exhibits (0.50).	1.30	Trial Preparation
11/20/2014	BPS	Preparation of Motion in Limine (0.20); conference with DBN re Motion in Limine (0.50); emails with Todd re witnesses and trial issues (0.20); telephone conference with Todd re witnesses and trial issues (0.40); received and examined David Ball's notes regarding Opening Statement (0.50); emails, including a long email, with Kostic re Opening Statement and conversation with Todd (0.50); telephone conference with Kostic re Opening Statement and trial issues (0.50); received and examined proposed Motion to Quash McBroom Subpoena (0.20); telephone conference with Kostic re McBroom (0.20); reviewed detailed outline of issues and proof (0.50).	3.70	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
11/21/2014	BPS	Emails with Kostic re Voir Dire questionnaire; preparation of Voir Dire Questionnaire (1.00); received filed Motion to Quash (0.20); telephone conferences with Kostic re voir dire, opening statement, and other trial issues (0.50); received Todd's revisions to Voir Dire questionnaire (0.20); emails with Todd re Questionnaire and trial issues (0.20); preparation of proposed Jury Instructions (3.50); received and examined Defendants' proposed jury instructions (0.40); received and examined Defendants' Motion in Limine (0.20); preparation of Motion in Limine (1.00); received and examined Objections to Plaintiff's Experts (0.20); preparation of Objections to Deposition Designations (0.50); received Defendants' Objections to Witnesses (0.20); preparation of Response to Motion to Quash (0.40); received Order on Motion to Quash Evans subpoena (0.10); preparation of Response to Witness List (0.20).	8.80	Trial Preparation
11/22/2014	DBN	Drafted preliminary response to defendants' motion to quash McBroom subpoena (0.50); reviewed defendants' filings from previous day (0.50); conference with BPS re defendants' pretrial filings and our responses (1.00); began drafting response to defendants' motion in limine (1.40); checked exhibit binders for missing page and inserted missing page (0.10); reviewed Ball's opening statement changes and discussed opening statement changes with BPS (0.40); extracted documents for review by witness (0.20).	4.10	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
11/22/2014	BPS	Preparation Opening Statement (1.50); reviewed detailed outline of issues and proof (0.50); telephone conferences with Kostic re trial issues (0.50); conference with DBN re pretrial filings and responses (1.0); conference with DBN re Opening Statement (0.40); preparation of foam boards (0.50); preparation of witness order (0.50); preparation of Amended Jury Charge (1.00); researched legal issues related to Jury Charge (1.00); emails with Kostic re jury instructions, opening statement, witnesses, and other trial issues (0.50); preparation of response to Motion to Quash McBroom (0.50).	7.90	Trial Preparation
11/23/2014	BPS	Conference with DBN re jury charge and trial strategy (0.70); researched jury charge issues (1.00); preparation of Amended Jury Charge (2.00); emails with Kostic re jury charge changes (0.50); telephone conferences with Kostic re jury charge changes and trial issues (0.80); reviewed detailed outline of issues and trial proof (1.00).	6.00	Trial Preparation
11/23/2014	DBN	Researched materially adverse actions, similarly situated, and spoliation for response to motion in limine (1.00); drafted response to motion in limine (4.20); conference with BPS re trial strategy and jury charge (0.70).	5.90	Trial Preparation
11/24/2014	BPS	Emails with Kostic re witnesses and trial issues (0.30); reviewed and prepared witness list order (0.40); received and examined Objections to Exhibits and Witnesses (0.30); received and examined notebooks of Defendants' exhibits (0.50); email with Court Clerk re trial procedure (0.10); researched Attorney-Client issues related to witness objections related to Bricker (1.00); preparation of Response to Motion to Quash McBroom (0.30); preparation of Objections to Defendants' Exhibits (1.00)	3.90	Trial Preparation
11/24/2014	BPS	Received Order Resetting Trial Date.	0.10	Case Management

Date	Time-Keeper	Description	Time	Phase
11/24/2014	DBN	Continued drafting response to Defendants' motion in limine (2.50); completed response to Defendants' motion to quash McBroom subpoena (0.30); drafted and formatted objections to Defendants' trial exhibits (1.20); filed Plaintiff's Response to Defendants' Motion to Quash McBroom Subpoena, Plaintiff's Objections to Defendants' Exhibits (0.30).	4.30	Trial Preparation
11/25/2014	BPS	Preparation for Pretrial Hearing (1.00); emails with Todd re exhibits (0.20); preparation of Response to Motion in Limine (0.50); preparation of Response to Objections to Exhibits (0.50); preparation of Response to Objections to Deposition Designations (3.00); conference with Kostic re responses and preparation of pretrial hearing (1.00); attended Pretrial Hearing (3.50); conference with Court IT re court media (0.50); conference with DBN and Kostic re rulings at Pretrial Hearing (1.00).	11.20	Trial Preparation
11/25/2014	DBN	Revised response to Defendants' motion in limine (0.50); proofed and edited response to motion in limine, response to objections to witnesses, response to objections to deposition designations (0.50); prepared for pretrial conference (0.70); attended pretrial hearing (3.50); technology review with court IT personnel (0.50); conference with BPS and Kostic re pretrial conference rulings (1.00).	6.70	Trial Preparation
11/26/2014	DBN	Courtroom technology review with court IT (1.00); loaded iPad with exhibits for trial (0.60); reviewed exhibits with BPS (0.50).	2.10	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
11/26/2014	BPS	Preparation of jury questionnaire (1.00); telephone conference with Kostic re trial issues (0.50); emails with Todd re jury questionnaire and witness order (0.30); emails with Kostic re witnesses and trial issues (0.30); reviewed exhibits with DBN (0.50); conference with Court IT person re courtroom technology (1.00); email with Court clerk regarding jury questionnaire (0.10); preparation of jury research forms (0.50)	4.20	Trial Preparation
11/28/2014	BPS	Emails with Todd re witness and exhibit issues and limine ruling (0.50); emails with Kostic re witnesses, exhibits and trial issues (0.40); telephone conference with Kostic re trial issues (0.50); received and examined list objections to exhibits by Todd (0.50); reviewed detailed trial evidence outline (0.50); email witness re subpoena (0.10); telephone conference with witness re trial (0.20); preparation of document of comments to Defendant's effect of pretrial ruling on Plaintiff's exhibits (0.50).	3.20	Trial Preparation
11/29/2014	BPS	Reviewed detailed trial proof outline (1.00); conference with Kostic re trial preparation, including witness order, exhibits, demonstrative aids, witness subpoenas, and opening statement (4.50); emails with Todd re witnesses and exhibits (0.20).	5.70	Trial Preparation
11/29/2014	DBN	Began drafting trial brief on "but for" causation (0.40); researched "but for" causation for trial brief (0.90); conference with BPS and client re witnesses and trial issues (1.20).	2.50	Trial Preparation
11/30/2014	DBN	Prepared sworn statements of Defendants' witnesses for use at trial (1.40); drafted trial brief on "but for" causation (1.20).	2.60	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
11/30/2014	BPS	Email with Todd re witnesses (0.10); emails with Gibson re jury selection (0.20); preparation of opening statement (2.00); preparation of jury selection (1.00); preparation of pretrial brief concerning causation (1.00).	4.30	Trial Preparation
12/1/2014	BPS	Emails with Kostic re trial issues (0.30); telephone conference with Hersh re opening statement and jury selection (0.40); preparation of opening statement (1.00); conference with Kostic re trial issues, including opening statement, examination of witnesses; witness order, exhibits, and demonstrative aids (5.0); conference with DBN re examination of witnesses (0.50); emails with Todd re witnesses (0.20); preparation of trial brief re but for causation (1.00); conference with witness re trial (0.50); telephone conferences with witnesses re trial (0.50);	9.40	Trial Preparation
12/1/2014	DBN	Loaded two iPads with exhibits and other trial documents (1.20); printed pleadings, direct examination outlines, mans other trial documents (0.90); continued preparing witness sworn statements for trial (0.60); conference with BPS re opening statement and direct examinations (0.50); researched "but for" causation for trial brief (0.60); completed drafting trial brief on "but for" causation (0.30); filed trial brief on "but for" causation (0.20).	4.30	Trial Preparation
12/2/2014	BPS	Preparation of Opening Statement (1.00); conference with DBN and Kostic re foam boards and exhibits (0.50); conferences with witnesses (1.0); conference with Kostic and DBN re witnesses and trial strategy (2.00); preparation of examination of witnesses (2.00).	6.50	Trial Preparation
12/2/2014	BPS	In-court trial time.	6.50	Trial

Date	Time-Keeper	Description	Time	Phase
12/2/2014	DBN	Preparation for direct examination of witness Bailey (0.50); conference with BPS and client re trial strategy (2.00); preparation for direct examination of witness Shi (1.50).	4.00	Trial Preparation
12/2/2014	DBN	Voir dire and jury selection (3.00); Trial (3.50).	6.50	Trial
12/3/2014	DBN	Prepared for direct examination of Shi (0.50); conference with client and BPS re trial strategy for following day (1.00).	1.50	Trial Preparation
12/3/2014	DBN	Assist at trial.	7.00	Trial
12/3/2014	BPS	Attended trial as lead counse.	7.00	Trial
12/3/2014	BPS	Conferences with witnesses (1.00); reviewed jury research data (0.50); conference with Kostic and DBN re witnesses and exhibits (1.50); preparation of witness examinations (3.00); conference with DBN re witnesses and examinations for next day (1.00).	7.00	Trial Preparation
12/4/2014	BPS	Conference with DBN before trial re witnesses and exhibits (1.00); conferences with Kostic re testimony (1.50); conference Kostic re jury research and witnesses (1.00); preparation for McBroom deposition (2.00).	5.50	Trial Preparation
12/4/2014	BPS	Attended trial as lead counsel.	6.50	Trial
12/4/2014	DBN	Conference with BPS re witnesses and exhibits (1.00); conference with BPS and client re witnesses and exhibits (1.50).	2.50	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
12/4/2014	DBN	Assisted at trial.	6.50	Trial
12/5/2014	BPS	Preparation of McBroom deposition (1.00); travel to McBroom deposition (1.00, reduced to 0.50); conference with Kostic re McBroom facts and exhibits (1.00); attended McBroom deposition (2.50); conference with Kostic after deposition re deposition and trial witnesses (0.30); travel from place of deposition in Bonham (1.00, reduced to 0.50).	5.80	Trial Preparation
12/5/2014	DBN	Reviewed prior sworn statements of witnesses and printed them for use in trial (1.00); compiled list of exhibits admitted into evidence (0.40); sent exhibit list to BPS for use in McBroom trial deposition (0.10).	1.50	Trial Preparation
12/6/2014	DBN	Email exchange with BPS and client re trial exhibits and time budget for trial.	0.30	Trial Preparation
12/6/2014	BPS	Emails with Kostic re trial issues (0.20); telephone conference with witness (0.20); telephone conference with Kostic re witnesses (0.20); preparation of witness examinations (1.00).	1.60	Trial Preparation
12/7/2014	BPS	Long telephone conference with Kostic re witnesses, claims, and various trial issues (1.20); reviewed deposition transcript of Jang (1.50); preparation of Jang cross-examination (1.50).	4.20	Trial Preparation
12/7/2014	DBN	Reviewed client notes in preparation for direct examination of Peer (0.90); began outline for direct examination of Peer (0.30).	1.20	Trial Preparation
12/7/2014	BPS	Telephone conference with Kostic re trial schedule issues (0.20); preparation of witness examination for Jones (1.80).	2.00	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
12/8/2014	BPS	Emails with Kostic re witness examinations and trial issues (0.40); reviewed witness examination outlines (1.00); telephone conferences with witnesses (0.50); reviewed jury research data (0.50); email with Todd re witnesses (0.10); conference with DBN re witness examinations (1.00).	3.50	Trial Preparation
12/8/2014	DBN	Conference with BPS re witness examination (1.00); email exchange with client re witnesses (0.30); preparation of witness examination of Granick (0.50).	1.80	Trial Preparation
12/9/2014	DBN	Conference with BPS re witnesses and exhibits before trial (1.00); conference with BPS and client after trial re witnesses and trial issues (2.00).	3.00	Trial Preparation
12/9/2014	DBN	Assisted at trial.	4.00	Trial
12/9/2014	BPS	Preparation of witness examinations before trial (1.00); conference with DBN re witnesses and exhibits before trial (1.00); conferences with witnesses (0.50); conference with DBN and Kostic re witnesses and trial issues (2.00); telephone conferences with witnesses (0.40).	4.90	Trial Preparation
12/9/2014	BPS	Attended trial as lead counsel.	4.00	Trial
12/10/2014	DBN	Preparation for witness examination (1.40); conference with BPS and client before trial (1.00); conference with BPS and client re trial matters after trial day (1.00); telephone conferences with witnesses re scheduling issues (1.00).	4.40	Trial Preparation
12/10/2014	DBN	Assisted at trial.	6.00	Trial

Date	Time-Keeper	Description	Time	Phase
12/10/2014	BPS	Conference with DBN re exhibits and witnesses (1.00); conferences with witnesses (1.00); telephone conference with witness (0.20); reviewed jury research data (0.50); conference Kostic and DBN re witnesses and exhibits (1.00); preparation of witness examination (3.00).	6.70	Trial Preparation
12/10/2014	BPS	Attended trial as lead counsel.	6.00	Trial
12/11/2014	DBN	Preparation for witness examination (1.50); conference with DBN and Kostic before trial re trial matters (0.50); conference with BPS and client after trial day re trial matters (1.00); reviewed exhibits admitted and remaining and witnesses remaining (1.00).	4.00	Trial Preparation
12/11/2014	DBN	Assisted at trial.	6.00	Trial
12/11/2014	BPS	Preparation for witness examinations (1.50); conference with DBN and Kostic before trial re trial matters (0.50); conference with witnesses (1.00); conference with DBN and Kostic re trial matters (1.00); telephone conference with witness re trial schedule (0.20).	4.20	Trial Preparation
12/11/2014	BPS	Attended trial as lead counsel.	6.00	Trial
12/12/2014	BPS	Conference with DBN re trial issues (0.30); examined jury research information (0.20); preparation of closing argument (0.50); email with Todd re witnesses (0.10); telephone conference with witnesses re trial (0.40).	1.50	Trial Preparation
12/12/2014	DBN	Conference with BPS re trial issues.	0.30	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
12/14/2014	BPS	Emails with Kostic re trial issues (0.30); telephone conference with Kostic re trial issues (0.40); conference with DBN re McBroom deposition (0.50); reviewed McBroom deposition transcript (0.50); emails with Todd re witnesses (0.20); preparation of witness examinations (1.00).	2.90	Trial Preparation
12/14/2014	DBN	Reviewed McBroom video for selection of edits (2.50); preparation of list of transcript edits matching video edits of McBroom trial deposition for review by BPS for trial designations (3.20); conference with BPS re McBroom deposition (0.50).	6.20	Trial Preparation
12/15/2014	BPS	Emails with Todd re witnesses (0.20); telephone conferences with witnesses (0.40); reviewed McBroom deposition (0.50); emails with Todd re McBroom deposition. (0.20); email with Law Clerk re proposed jury instructions (0.20); preparation of McKinney deposition designations (0.50); conference with Kostic and DBN re trial strategy and witnesses (2.50); preparation of closing statement (2.00).	6.50	Trial Preparation
12/15/2014	DBN	Completed video edits and captioning of McBroom deposition for use in trial (2.30); reviewed outlines and associated exhibits for direct examination of witnesses (1.00); conference with client and BPS re trial strategy, witness sequence, and witness examinations (2.50); proofed and edited Designations of McKinney Deposition Excerpts (0.20).	6.00	Trial Preparation
12/16/2014	DBN	Conference with BPS re witnesses and exhibits (1.00); prepared for direct examination of witnesses (0.50); prepared witness photos for jury and opposing counsel (1.50); researched limited-purpose public figure in defamation (0.60); proofed and edited Plaintiff's Trial Brief re Defamation (0.20).	3.80	Trial Preparation

Date	Time-Keeper	Description	Time	Phase
12/16/2014	DBN	Assisted at trial.	7.00	Trial
12/16/2014	BPS	Conference with DBN re trial exhibits and witnesses (1.00); conferences with witnesses (1.00); preparation of defamation brief (2.00); preparation of witness examinations (1.00); preparation of closing statement (2.00); reviewed research data to date of shadow jurors (0.30).	7.30	Trial Preparation
12/16/2014	BPS	Attended trial as lead counsel.	7.00	Trial
12/17/2014	BPS	Preparation for charge conference (1.00); preparation of closing argument (2.50); received, reviewed, and revised proposed jury instructions (1.00); reviewed research data to date of shadow jurors (0.30).	4.80	Trial Preparation
12/17/2014	BPS	Attended trial as lead counsel.	5.00	Trial
12/17/2014	DBN	Reviewed jury instructions in preparation for charge conference (0.40); reviewed closing argument and demonstrative aids for closing argument (0.50).	0.90	Trial Preparation
12/17/2014	DBN	Assisted at trial (5.00); awaited jury verdict (1.20).	6.20	Trial
12/18/2014	DBN	Reviewed trial material checklist and exhibit checklist for assessment of completion and collection from Court (0.50); reviewed trial material checklist and exhibit checklist for assessment of completion (0.50).	1.00	Trial Preparation
12/18/2014	DBN	Awaited and received jury verdict.	6.50	Trial
12/18/2014	BPS	Attended Court while jury deliberated and received jury verdict.	6.50	Trial

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

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Date	Time-Keeper	Description	Time	Phase
1/3/2015	BPS	Email with Kostic re appeal and judgment issues (0.10); conference with DBN re appeal and judgment issues (0.10).	0.20	Post-Trial
1/3/2015	DBN	Conference with BPS re appeal and judgment issues.	0.10	Post-Trial
1/8/2015	BPS	Reviewed emails with Kostic re post-trial motions (0.20); conference with Kostic re prejudgment interest and front pay (1.00); preparation of draft of Motion for Judgment on Verdict and for Prejudgment Interest (1.00).	2.20	Post-Trial
1/13/2015	BPS	Examined front pay cases (1.50); preparation of front pay insert (1.50).	3.00	Post-Trial
1/18/2015	BPS	Preparation of motion and brief re front pay.	2.00	Post-Trial
1/19/2015	BPS	Preparation of motion for judgment and brief (4.5); emails with Kostic re motion for judgment (0.20); telephone conferences with Kostic re motion for judgment (0.30)	5.00	Post-Trial
1/20/2015	BPS	Emails with Kostic re motion for judgment (0.20); conference with DBN re motion for judgment (0.20); emails with Todd re extension (0.20); preparation of motion for extension (0.50); researched prejudgment interest cases (0.50); preparation of prejudgment interest section of motion for judgment (1.0).	2.60	Case Management
1/21/2015	BPS	Preparation of Motion for Judgment (2.00).	2.00	Post-Trial

Date	Time-Keeper	Description	Time	Phase
1/22/2015	BPS	Emails with Kostic re Motion for Judgment (0.40); conferences with DBN re Motion for Judgment (1.00); researched present value issues (1.00); telephone conferences with Kostic re Motion for Judgment issues (0.80); preparation of Motion for Judgment (5.50); preparation of proposed judgment (0.50).	9.20	Post-Trial
1/22/2015	DBN	Conference with BPS re motion for judgment and appendix (1.00); prepared appendix for motion for judgment (0.70); made edits to motion for judgment (0.50); created table of contents and table of authorities for motion for judgment (0.90); researched citations, exhibits, and transcripts for motion for judgment (1.20); proofed and edited motion for judgment (0.20); emailed proposed order to court (0.10).	4.60	Post-Trial
2/2/2015	BPS	Received notice of Vacation Letter (0.10).	0.10	Case Management
2/2/2015	BPS	Reviewed <i>Mota</i> case law (0.20); email with Kostic re judgment issues (0.10).	0.30	Post-Trial
2/3/2015	DBN	Conference call with BPS and NK re reply to response to motion for judgment.	0.70	Post-Trial
2/3/2015	BPS	Telephone conference with Kostic re judgment issues.	0.40	Post-Trial
2/9/2015	BPS	Telephone conference with Gautum re witness fee (0.20); email with Gautum re witness fee (0.10); telephone conference with Kostic re trial and judgment issues (0.20).	0.50	Post-Trial

Date	Time-Keeper	Description	Time	Phase
2/10/2015	BPS	Received and examined Response to Motion for Judgment (0.20)	0.20	Post-Trial
2/16/2015	BPS	Email with Kostic re reply to response to motion for judgment (0.10); conference with DBN re reply to response (0.10); reviewed response to motion for judgment (0.20).	0.40	Post-Trial
2/22/2015	BPS	Researched issues related to Reply to Response to Motion for Judgment (1.00); preparation of draft of Reply to Response to Motion for Judgment (1.00).	2.00	Post-Trial
2/23/2015	BPS	Emails with Kostic re reply to response (0.20); preparation of Reply to Response to Motion for Judgment (1.50).	1.70	Post-Trial
2/24/2015	DBN	Edited Reply re motion for judgment (0.80); researched benefits in front pay issue (0.70);	1.50	Post-Trial
2/24/2015	DBN	Drafted motion for extension (0.20); conferred with opposing counsel via email re motion for extension (0.10); phone call to client re Reply (0.20).	0.50	Case Management
2/25/2015	BPS	Preparation of Reply to Motion for Judgment (4.50); emails with Kostic re Reply (0.20); conference with DBN re Reply (0.30).	5.00	Post-Trial
2/25/2015	DBN	Conference with BPS re Reply.	0.30	Post-Trial
5/4/2015	BPS	Revised proposed judgment (0.30); conference with DBN re proposed judgment (0.10); email Kostic re proposed judgment and proposed wording of email (0.10).	0.50	Post-Trial

Date	Time-Keeper	Description	Time	Phase
5/5/2015	BPS	Email with Kostic re proposed judgment (0.10); email court re proposed judgment (0.10).	0.20	Post-Trial
5/8/2015	BPS	Email with Tremain re fee application.	0.10	Fees & Costs
7/21/2015	BPS	Telephone conference with Kostic re motion for oral argument and application for fees.	0.40	Fees & Costs
7/27/2015	BPS	Emails with Todd re motion for hearing (0.10); emails with Kostic re motion for hearing (.10); preparation of motion for hearing (0.30).	0.50	Post-Trial
7/28/2015	BPS	Emails with Kostic re motion for hearing (0.10); revised motion for hearing (0.10).	0.20	Post-Trial
7/30/2015	BPS	Revised and filed motion for hearing (0.10); emails with Kostic re motion for hearing (0.10).	0.20	Post-Trial
8/21/2015	BPS	Telephone conference with Kostic re fee application issues (0.40); telephone conference with McKnight re fee application issues (0.10); preparation of emails to attorneys requesting declarations (0.10); emails with Todd and his office re motion to extend (0.10); conference with DBN re motion to extend (0.10); researched federal rules re extension of application for fees and costs (0.20); revised and edited motion to extend and proposed order (0.20).	1.20	Fees & Costs
8/21/2015	DBN	Drafted motion to extend time to file motion for Attorneys's fees and bill of costs (0.40); drafted proposed order on motion to extend time (0.20).	0.60	Fees & Costs

Date	Time-Keeper	Description	Time	Phase
9/3/2015	BPS	Telephone conference with attorney re fee declaration.	0.20	Fees & Costs
9/11/2015	BPS	Reviewed pleadings and orders for preparation of declaration (0.50); preparation of draft of declaration for attorney's fees (1.00).	1.50	Fees & Costs
9/15/2015	BPS	Telephone conference with Kostic re declaration and fee motion issues (0.3); telephone conference with McKnight re declaration and fee app issues (0.2).	0.50	Fees & Costs
9/16/2015	BPS	Reviewed motion for fees in preparation for declaration revisions (0.20); reviewed pleadings and orders to support statements in declaration (0.30) revised and added to declaration (1.00).	1.50	Fees & Costs
9/17/2015	BPS	Telephone conferences with Kostic re fee motion and declaration (0.30); email with Todd re fee motion issues (0.10); telephone conference with Todd re fee motion (0.10); revised and edited declaration (1.00); reviewed supporting declarations of other attorneys (0.40); preparation of inserts to fee motion re common facts (0.30).	2.20	Fees & Costs
			1233.40	

The Sanford Firm's Timekeeper Totals (based on actual time recorded):

Brian P. Sanford (BPS):	752.50 hours x \$650.00 = \$489,125.00
David B. Norris (DBN):	445.90 hours x \$250.00 = \$111,475.00
David B. Norris-Law Clerk (pre-license) (DBN-LC)	13.40 hours x \$100.00 = \$1,340.00
Ashley E. Tremain (AET):	21.60 hours x \$225.00 = \$4,860.00
	<u>1233.4 hours</u> <u>\$606,800.00</u>

Exh. 2: The Sanford Firm's Time Entries (with Totals, Segment Breakdown & Billing Judgment Reductions)

Totals by Segment:

Case Management

BPS:	19.20
DBN:	5.80
AET:	<u>1.80</u>
	26.80

Discovery

BPS:	183.90
DBN:	117.80
DBN-LC:	<u>13.40</u>
	315.10

Dispositive Motions:

BPS:	136.80
DBN:	107.40
AET:	<u>7.40</u>
	251.60

Fees & Costs:

BPS:	7.60
DBN:	<u>0.60</u>
	8.20

Investigation & Pleading

BPS:	16.60
DBN:	5.70
AET:	<u>12.40</u>
	34.70

Lemanski:

BPS:	0.00
DBN:	<u>0.00</u>
	0.00

Post-Trial

BPS:	35.70
DBN:	<u>7.20</u>
	42.90

Settlement:

BPS:	4.40
DBN:	<u>0.50</u>
	4.90

Trial Preparation

BPS:	293.80
DBN:	<u>145.20</u>
	439.00

Trial

BPS:	54.50
DBN:	<u>55.70</u>
	110.20

Further Billing Judgment Reductions:

1. BPS time spent in one-on-one conferencing with client: 86.60 hours
Reduced by 50 percent to 43.30 hours
2. DBN time spent in one-on-one conferencing with client: 7.30 hours
Reduced by 50 percent to 3.65 hours
3. DBN-LC time spent in one-on-one conferencing with client: 2.30 hours
Reduced by 50 percent to 1.15 hours

The Sanford Firm's Timekeeper Adjusted Totals:

Brian P. Sanford (BPS):	(752.50 - 43.30) hours x \$650.00 = \$460,980.00
David B. Norris (DBN):	(445.90 - 3.65) hours x \$250.00 = \$110,562.25
David B. Norris—Law Clerk (pre-license) (DBN-LC)	(13.40 - 1.15) hours x \$100.00 = \$ 1,225.00
Ashley E. Tremain (AET):	<u>21.60 hours x \$225.00 = \$ 4,860.00</u>
	1185.30 hours \$577,627.25

Johnson Reduction to the Adjusted Lodestar of 10 Percent to Account for Unsuccessful Claims:

$$\$577,627.25 - \$57,762.72 = \$519,864.53$$

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
Filing Fees¹			
	2010-11-08	\$ 350.00	Original Complaint
		\$ 350.00	
Subpoena Service²			
	2014-11-14	\$ 70.00	Lloyd
	2014-11-17	\$ 80.00	Starnes Service Fee
	2014-11-17	\$ 90.00	Zhang Service Fee
	2014-11-17	\$ 90.00	Ni Service Fee
	2014-11-17	\$ 90.00	Baur Service Fee
	2014-11-17	\$ 90.00	Kopachena Service Fee
	2014-11-17	\$ 70.00	Bertulani Service Fee
	2014-11-17	\$ 80.00	Attardo Service Fee
	2014-11-17	\$ 70.00	McInnes Service Fee
	2014-11-17	\$ 80.00	Brown Service Fee
	2014-11-17	\$ 90.00	Fullwood Service Fee
	2014-11-24	\$ 90.00	McBroom Service Fee
	2014-11-24	\$ 90.00	Parker Service Fee
	2014-11-24	\$ 70.00	Huber Service Fee
	2014-12-02	\$ 110.00	Peer Service Fee APS
	2014-12-02	\$ 255.00	Evans Service Fee APS

¹ Also on Bill of Costs.

² Private process server.

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
	2014-12-5	\$ 80.00	Harry Service Fee
	2014-12-5	\$ 80.00	McKinney Service Fee Bad Address
	2014-12-5	\$ 80.00	McKinney Service Fee Location Service Halted
	2014-12-5	\$ 80.00	Helleson Service Fee
	2014-12-5	\$ 80.00	Vonausdall Service Fee Attempted
		\$ 1,915.00	

Depositions

2012-03-27	\$	704.96	Vieira Depo
2012-03-27	\$	459.36	Fullwood Depo
2012-3-27	\$	936.71	McBroom Depo
2012-04-05	\$	930.55	Myers Depo
2012-04-25	\$	1,514.86	Jang Depo
2012-04-26	\$	586.16	Brown Depo
2012-04-26	\$	322.96	Ball Depo
2012-05-03	\$	601.95	Evans Depo
2012-05-09	\$	527.10	Kostic Depo Vol. 1
2012-07-06	\$	751.60	Kostic Depo Vol. 2
2012-07-23	\$	2,138.10	Lemanski Depo
2012-07-25	\$	1,093.50	Peer Depo
2012-07-31	\$	1,111.00	Lemanski Depo Video
2012-08-09	\$	1,537.50	Jones Depo JRA
2012-08-22	\$	528.25	McKinney Depo JRA
2014-09-08	\$	199.70	Caldwell Depo Integrity

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
	2014-12-05	\$ 1,034.00	McBroom Depo JRA
	2014-12-05	\$ 606.00	McBroom Depo Video JRA
		\$ 15,584.26	
Exemplification			
	2015-12-14	\$ 224.08	Printing demonstrative exhibits for trial (also on bill of costs)
		\$ 224.08	
Experts			
	2014-09-16	\$ 300.00	Dr. Gautam
	2014-09-16	\$ 200.00	Caldwell
		\$ 500.00	
Electronic Research			
	2010-11-30	\$ 330.10	Westlaw
	2011-02-28	\$ 531.30	Westlaw
	2011-12-31	\$ 155.68	Westlaw
	2012-03-31	\$ 565.85	Westlaw
	2012-04-30	\$ 537.23	Westlaw
	2013-05-31	\$460.70	Westlaw
	2013-07-31	\$ 34.14	Westlaw
	2015-12-31	\$ 611.26	Westlaw
		\$ 3,226.26	

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
Postage & Delivery	2011-10-19	\$ 1.68	USPS
	2011-04-15	\$ 7.19	Postage
	2011-04-15	\$ 19.03	Fed Ex
	2011-12-08	\$ 1.08	USPS
	2012-01-06	\$ 5.00	USPS
	2012-02-24	\$ 21.05	FedEx
	2012-02-24	\$ 5.10	USPS
	2012-03-20	\$ 18.75	FedEx
	2012-06-25	\$ 23.03	FedEx
	2012-06-28	\$ 23.03	FedEx
	2012-07-19	\$ 17.76	FedEx
	2012-10-08	\$ 1.50	USPS
	2012-10-11	\$ 5.15	USPS
	2012-11-19	\$ 5.10	USPS
	2013-04-24	\$ 5.05	USPS
	2013-5-14	\$ 20.00	Couriers & Freight to Judge
	2013-10-08	\$ 10.10	USPS
	2013-12-02	\$ 5.25	USPS
	2013-12-12	\$ 1.35	USPS
	2014-03-25	\$ 5.70	USPS
	2014-04-29	\$ 25.92	Cert Postage for Med Records.
	2014-06-20	\$ 6.48	Cert Postage Caldwell

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
	2014-9-16	\$ 27.40	FedEx
	2014-10-01	\$ 5.05	USPS to Gautam
	2014-10-09	\$ 25.51	FedEx
	2014-10-16	\$ 5.05	USPS
	2014-10-16	\$ 5.05	USPS Gautam
	2014-10-27	\$ 6.00	USPS and disk
	2014-11-4	\$ 6.00	USPS and disk
	2014-11-18	\$ 10.27	FedEx
	2014-12-09	\$ 27.00	Courier to Court
		\$ 351.63	
Witness Fees³			
	2014-10-09	\$ 40.00	Shi Witness Fee
	2014-11-07	\$ 40.00	Vonausdall Witness Fee
	2014-11-07	\$ 48.02	Huber Witness Fee
	2014-11-07	\$ 40.00	Evans Witness Fee
	2014-11-07	\$ 151.96	Parker Witness Fee
	2014-11-07	\$ 118.81	Ni Witness Fee
	2014-11-07	\$ 93.50	Brown Witness Fee
	2014-11-07	\$ 40.00	McKinney Witness Fee
	2014-11-07	\$ 102.90	Attardo Witness Fee
	2014-11-07	\$ 91.82	Starnes Witness Fee

³ Also on bill of costs.

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
	2014-11-07	\$ 131.58	Kopachena Witness Fee
	2014-11-07	\$ 138.07	Baur Witness Fee
	2014-11-07	\$ 118.92	Fullwood Witness Fee
	2014-11-07	\$ 121.50	McBroom Witness Fee
	2014-11-07	\$ 168.20	Peer Witness Fee
	2014-11-07	\$ 70.35	Bertulani Witness Fee
	2014-11-07	\$ 76.36	MacInnes Witness Fee
	2014-11-07	\$ 76.46	Helleson Witness Fee
	2014-11-07	\$ 118.81	Zhang Witness Fee
	2014-11-14	\$ 50.00	Lloyd Witness Fee
	2014-12-02	\$ 50.00	Davis Witness Fee
		\$ 1,887.26	

Copies⁴

	2011-10-31	\$ 416.10	Copies/Scan
	2011-12-31	\$ 155.68	Copies/Scan
	2012-03-31	\$ 478.35	Copies
	2012-03-31	\$ 165.60	Scan/Fax
	2012-04-30	\$ 111.60	Scan/Fax
	2012-04-30	\$ 192.60	Copies
	2012-11-30	\$ 520.00	Scan/Fax
	2012-11-30	\$ 941.60	Copies

⁴ All scanning, faxing, and black-and-white copying provided in-house at \$0.10/page, and all color copying provided in-house at \$0.20/page. Also on bill of costs.

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
	2014-12-31	\$ 1,660.00	Trial Printing
		\$ 4,641.53	
Travel (Air, Hotel, Meals, Local Transport)			
	2014-6-16	\$ 107.83	Sanford & Norris Courtyard Marriott Durham NC
	2014-06-17	\$ 47.79	Pre-payment for rental car during travel in July to Durham, NC, to Malekpour & Ball (trial consultants)
	2014-06-17	\$ 1,056.00	Sanford and Norris airfare for travel in July to Durham, NC, to Malekpour & Ball (trial consultants)
	2014-07-14	\$ 34.24	Additional payment for rental car during travel to Durham, NC, to Malekpour & Ball (trial consultants)
	2014-07-19	\$ 56.12	Sanford & Norris Meal Durham NC
	2014-07-20	\$ 8.99	Fuel for Rental car in Durham NC
		\$ 1,310.97	
Litigation Consultants			
	2013-11-21	\$ 2,100.00	Pat Montes (deposition preparation)
	2014-06-29	\$ 23,875.00	JuryWatch, Inc. (Malekpour & Ball) (trial preparation)
	2014-08-23	\$ 1,700.00	Focus Group Large (facility rental; mock juror snacks & payment)

Summary of Costs, Sorted by Type
Kostic v. TAMUC, No. 3:10-cv-02265-M

Category	Date	Amount	Description
	2014-10-23	\$ 500.00	Focus Group Dedicated (mock juror snacks & payment)
	2014-12-15	\$ 760.00	Sowells Shadow Juror (at trial; partial)
	2014-12-19	\$ 965.00	Addleman Shadow Juror (at trial; full)
	2014-12-19	\$ 1,965.00	Sullivan Shadow Juror (at trial; full)
		\$ 31,865.00	
Misc. Expenses			
	2014-02-11	\$ 22.00	Cert records Dahlem
	2014-12-03	\$ 49.24	Sanford and Norris working dinner with client during trial
	2014-12-12	\$ 52.00	Sanford and Norris parking during trial
	2015-12-18	\$ 15.95	Sanford and Norris lunch during trial
		\$ 139.19	
TOTAL:		\$ 61,995.18	

AO 133 (Rev. 12/09) Bill of Costs

UNITED STATES DISTRICT COURT

for the
Northern District of TexasKostic
v.
Texas A&M University at Commerce

Case No.: 3:10-cv-02265-M

BILL OF COSTS

Judgment having been entered in the above entitled action on 08/13/2015 against Defendant,
the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ <u>350.00</u>
Fees for service of summons and subpoena	<u>0.00</u>
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	<u>15,584.26</u>
Fees and disbursements for printing	<u>0.00</u>
Fees for witnesses (itemize on page two)	<u>1,887.26</u>
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case,	<u>4,865.61</u>
Docket fees under 28 U.S.C. 1923	<u>0.00</u>
Costs as shown on Mandate of Court of Appeals	<u>0.00</u>
Compensation of court-appointed experts	<u>0.00</u>
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	<u>0.00</u>
Other costs (please itemize)	<u>0.00</u>
TOTAL	\$ <u>22,687.13</u>

SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:



Electronic service



First class mail, postage prepaid



Other:

s/ Attorney:

Name of Attorney:

Brian P. Sanford

For:

Nenad Kostic

Name of Claiming Party

Date:

2/17/15

Taxation of Costs

Costs are taxed in the amount of _____ and included in the judgment.

By:

Clerk of Court

Deputy Clerk

Date

AO 133 (Rev. 12/09) Bill of Costs

UNITED STATES DISTRICT COURT

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)

NAME, CITY AND STATE OF RESIDENCE	ATTENDANCE		SUBSISTENCE		MILEAGE		Total Cost Each Witness
	Days	Total Cost	Days	Total Cost	Miles	Total Cost	
C. Shi, El Paso TX	1	40. ⁰⁰	-	-	-	-	40.00
A. Vonaudall, Houston, TX	1	40. ⁰⁰	-	-	-	-	40.00
G. Huber, Dallas, TX	1	40.00	-	-	14.32	8.02	48.02
C. Evans, Detroit, MI	1	40. ⁰⁰	-	-	-	-	40.00
B. Ni, Commerce, TX	1	40. ⁰⁰	-	-	140.73	78.81	118.81
R. Brown Denton, TX	1	40. ⁰⁰	-	-	75.53	53.50	93.50
					TOTAL		380.33

NOTICE

Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:

"Sec. 1924. Verification of bill of costs."

"Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed."

See also Section 1920 of Title 28, which reads in part as follows:

"A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

The Federal Rules of Civil Procedure contain the following provisions:

RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

RULE 6

(d) Additional Time After Certain Kinds of Service.

When a party may or must act within a specified time after service and service is made under Rule 5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

RULE 58(e)

Cost or Fee Awards:

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

AO 133 (Rev. 12/09) Bill of Costs

UNITED STATES DISTRICT COURT

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)

NAME, CITY AND STATE OF RESIDENCE	ATTENDANCE		SUBSISTENCE		MILEAGE		Total Cost Each Witness
	Days	Total Cost	Days	Total Cost	Miles	Total Cost	
M. McKinney, Bryan, TX	1	40.00	-	-	-	-	40.00
S. Attardo, Greenville, TX	1	40.00	-	-	112.32	62.90	102.90
S. Starnes, Caddo Mills, TX	1	40.00	-	-	92.53	51.82	91.82
J. Kopachewa, Sulphur Springs, TX	1	40.00	-	-	163.35	91.58	131.58
M. Bauer, Sulphur Springs, TX	1	40.00	-	-	175.12	98.07	138.07
H. Fullwood, Commerce, TX	1	40.00	-	-	140.23	78.92	118.92
					TOTAL		623.29

NOTICE

Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:

"Sec. 1924. Verification of bill of costs."

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AO 133 (Rev. 12/09) Bill of Costs

UNITED STATES DISTRICT COURT

Witness Fees (computation, cf. 28 U.S.C. 1821 for statutory fees)

NAME, CITY AND STATE OF RESIDENCE	ATTENDANCE		SUBSISTENCE		MILEAGE		Total Cost Each Witness
	Days	Total Cost	Days	Total Cost	Miles	Total Cost	
R. Mc Broom, Braham, TX	1	40. ⁰⁰	-	-	145.53	81.50	121.50
G. Pear, Stephenville, TX	1	40. ⁰⁰	-	-	228.73	128.20	168.20
C. Bertulani, Plano, TX	1	40. ⁰⁰	-	-	54.19	30.35	70.35
C. Mac Innes, Allen, TX	1	40. ⁰⁰	-	-	64.93	36.36	76.36
M. Hollison, Fate, TX	1	40. ⁰⁰	-	-	65.11	36.46	76.46
B. Zhang, Commerce, TX	1	40. ⁰⁰	-	-	140.73	78.81	118.81
					TOTAL		631.68

NOTICE

Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:

"Sec. 1924. Verification of bill of costs."

"Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed."

See also Section 1920 of Title 28, which reads in part as follows:

"A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

The Federal Rules of Civil Procedure contain the following provisions:

RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

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A. P. S. Process Services
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/24/2014	23615

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

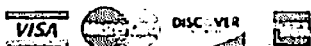
PAID
11/25/2014

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/24/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	65.00	65.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v		
		Texas A&M University at Commerce		
		Civil Action No : 3:10-CV-2265-M		
		By serving: Kyle Lloyd, M.D.		
Thank you for your business.			Total	\$70.00

Balance Due **\$0.00**



For your convenience credit card payments are accepted on our website www.apsprocess.com.

**A. P. S. Process Services**

1910 Pacific Avenue
Suite 15650
Dallas, TX 75201
214-290-4639

Invoice

Date	Invoice #
11/17/2014	23587

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	75.00	75.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm In re: Nenad Kostic v. Texas A&M University at Commerce Case # 3:10-CV-2265-M By serving: Stephen Starnes, Ph.D.	5.00	5.00

Thank you for your business.

Total \$80.00

Balance Due \$80.00



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**A. P. S. Process Services**

1910 Pacific Avenue
Suite 15650
Dallas, TX 75201
214-290-4639

Invoice

Date	Invoice #
11/17/2014	23591

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	85.00	85.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Qianying Zhang		

Thank you for your business.

Total \$90.00

Balance Due \$90.00



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P. Appx. 113



A. P. S. Process Services
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/17/2014	23590

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	85.00	85.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		Bukuo Ni, Ph.D.		

Thank you for your business.

Total \$90.00

Balance Due \$90.00



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**A. P. S. Process Services**

1910 Pacific Avenue
Suite 15650
Dallas, TX 75201
214-290-4639

Invoice

Date	Invoice #
11/17/2014	23588

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	85.00	85.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm In re: Nenad Kostic v. Texas A&M University at Commerce Case # 3:10-CV-2265-M By serving: Molly Baur	5.00	5.00

Thank you for your business.

Total \$90.00

Balance Due \$90.00



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P. Appx. 115

**A. P. S. Process Services**

1910 Pacific Avenue
Suite 15650
Dallas, TX 75201
214-290-4639

Invoice

Date	Invoice #
11/17/2014	23586

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	85.00	85.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Jeff Kopachena, Ph.D.		

Thank you for your business.

Total \$90.00

Balance Due \$90.00



For your convenience credit card payments are accepted on our website www.apsprocess.com.

 **A. P. S. Process Services**
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/17/2014	23592

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	65.00	65.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Carlos Bertulani, Ph.D.		

Thank you for your business.

Total \$70.00

Balance Due \$70.00



For your convenience credit card payments are accepted on our website www.apsprocess.com.

P. Appx. 117



A. P. S. Process Services
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/17/2014	23584

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	75.00	75.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Salvatore Attardo, Ph.D.		

Thank you for your business.

Total \$80.00

Balance Due \$80.00



For your convenience credit card payments are accepted on our website www.apspprocess.com.

P. Appx. 118

 **A. P. S. Process Services**
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/17/2014	23589

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	65.00	65.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Charlotte MacInnes		

Thank you for your business.

Total \$70.00

Balance Due \$70.00



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P. Appx. 119

**A. P. S. Process Services**

1910 Pacific Avenue
Suite 15650
Dallas, TX 75201
214-290-4639

Invoice

Date	Invoice #
11/17/2014	23593

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	75.00	75.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Robert Brown		

Thank you for your business.

Total \$80.00

Balance Due \$80.00



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P. Appx. 120



A. P. S. Process Services
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/17/2014	23585

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/17/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	85.00	85.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Harry Fullwood, Ph.D.		

Thank you for your business.


Total \$90.00

Balance Due \$90.00



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P. Appx. 121

 **A. P. S. Process Services**
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/24/2014	23618

Bill To The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201
--

PAID
11/25/2014

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/24/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	85.00	85.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Civil Action No.: 3:10-CV-2265-M		
		By serving: Randy McBroom, Ph.D.		
Thank you for your business.			Total	\$90.00

Balance Due **\$0.00**



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**A. P. S. Process Services**

1910 Pacific Avenue

Suite 15650

Dallas, TX 75201

214-290-4639

Invoice

Date	Invoice #
11/24/2014	23616

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

PAID
11/25/2014

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/24/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	85.00	85.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Civil Action No.: 3:10-CV-2265-M		
		By serving: Erica Parker		
Thank you for your business.			Total	\$90.00

Balance Due	\$0.00
--------------------	---------------

For your convenience credit card payments are accepted on our website www.apsprocess.com.



A. P. S. Process Services
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
11/24/2014	23617

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

PAID
 11/25/2014

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/24/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	65.00	65.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Civil Action No.: 3:10-CV-2265-M		
		By serving: Gerard Huber		

Thank you for your business.

Total \$70.00

Balance Due \$0.00



For your convenience credit card payments are accepted on our website www.apsprocess.com.

P. Appx. 124

**A. P. S. Process Services**

1910 Pacific Avenue

Suite 15650

Dallas, TX 75201

214-290-4639

Invoice

Date	Invoice #
11/25/2014	23648

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	11/25/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Service of a Subpoena	105.00	105.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Gary G. Peer, Ph.D.		
Thank you for your business.			Total	\$110.00

Balance Due \$110.00For your convenience credit card payments are accepted on our website www.apsprocess.com.

**A. P. S. Process Services**

1910 Pacific Avenue
Suite 15650
Dallas, TX 75201
214-290-4639

Invoice

Date	Invoice #
11/25/2014	23649

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.


Terms	Due Date
Due on receipt	11/25/2014

Item	Quantity	Description	Rate	Amount
Process Services Su...	1	Attempted Service of a Subpoena (Bad address provided)	105.00	105.00
Process Locate	0.5	Locating of a person in order to complete service of process.	80.00	40.00
Process Services Su...	1	Service of a Subpoena	105.00	105.00
Officer's Return Filing	1	Filing of the officer's return in the appropriate court and returning a file stamped copy to the law firm	5.00	5.00
		In re:		
		In re:		
		Nenad Kostic		
		v.		
		Texas A&M University at Commerce		
		Case # 3:10-CV-2265-M		
		By serving: Christine Evans, Ph.D.		
Thank you for your business.			Total	\$255.00

Balance Due **\$255.00**



For your convenience credit card payments are accepted on our website www.apsprocess.com.

 **A. P. S. Process Services**
 1910 Pacific Avenue
 Suite 15650
 Dallas, TX 75201
 214-290-4639

Invoice

Date	Invoice #
12/5/2014	23675

Bill To
The Sanford Firm 1910 Pacific Avenue, Suite 15400 Dallas, TX 75201

We've moved! Please note our new address listed above.

Terms	Due Date
Due on receipt	12/5/2014

Item	Quantity	Description	Rate	Amount
Process Locate	1	Locating of a person in order to complete service of process: Allison Harry (Service halted by Nenad Kostic)	80.00	80.00
Process Services Su...	1	Attempted Service of a Subpoena: Michael D. McKinney (Bad address)	80.00	80.00
Process Locate	1	Locating of a person in order to complete service of process: Michael D. McKinney (Service halted by Nenad Kostic)	80.00	80.00
Process Services Su...	1	Attempted Service of a Subpoena: Michael Helleson (No contact with the named person Service halted by Nenad Kostic)	80.00	80.00
Process Services Su...	1	Attempted Service of a Subpoena: Alexandra Vonausdall (Bad Address Service halted by Nenad Kostic)	80.00	80.00
In re: Nenad Kostic v. Texas A&M University at Commerce Case No.: 3:10-CV-2265-M				
Thank you for your business.			Total	\$400.00

Balance Due **\$400.00**



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JANIS ROGERS
& ASSOCIATES
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DALLAS, TX 75235
214/631-2655 FAX 214/631-2690
TAX I.D. NO. 75-2520745

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SANFORD BETHUNE
3610 SHIRE BOULEVARD
SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120434
DATE:05/18/12

JRT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF HARRY FULLWOOD	03/27/12	1THRAD	459.36
ORIGINAL DEPOSITION OF MICHELE VIEIRA	03/27/12	1THRAD	704.96
TOTAL DUE			\$ 1,164.32

JANIS ROGERS
& ASSOCIATES
1545 WEST MOCKINGBIRD LANE
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DALLAS, TX 75235
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SANFORD BETHUNE
3610 SHIRE BOULEVARD
SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120435
DATE:05/18/12

COURT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF JAMES RANDY MCBROOM	03/27/12	1THRAD	936.71
TOTAL DUE			\$ 936.71

JANIS ROGERS
& ASSOCIATES
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SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120436
DATE:05/18/12

JRT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF CHRIS ANTHONY MYERS	04/05/12	1THRAD	930.55
TOTAL DUE			\$ 930.55

JANIS ROGERS
& ASSOCIATES
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SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120437
DATE:05/18/12

JRT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF BEN W.-L JANG	04/25/12	JORDAS	1514.86
TOTAL DUE			\$ 1,514.86

JANIS ROGERS
& ASSOCIATES
1545 WEST MOCKINGBIRD LANE
SUITE 1032
DALLAS, TX 75235
214/631-2655 FAX 214/631-2690
TAX I.D. NO. 75-2520745

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SANFORD BETHUNE
3610 SHIRE BOULEVARD
SUITE 206
RICHARDSON TX 75082

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MAY 22 2012

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ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120438
DATE:05/18/12

JRT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF BOB BROWN	04/26/12	JORDAS	586.16
ORIGINAL DEPOSITION OF STEVE BALL	04/26/12	JORDAS	322.96
TOTAL DUE			\$ 909.12

Meadowbrook Court Reporting

6/25/2012

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
6/25/2012	Bill	43311	601.95	601.95		601.95
				-	Check Amount	601.95

Checking - Compass

601.95

BRIAN P. SANFORD PC

6294

Meadowbrook Court Reporting

6/25/2012

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
6/25/2012	Bill	43311	601.95	601.95		601.95
					Check Amount	601.95

Evans

Checking - Compass

601.95

MEADOWBROOK COURT REPORTING
P.O BOX 624
UNION LAKE, MI 48387-0624
(248) 334-6300 FAX (248) 564-5295

CONFERENCE ROOM:
2240 LIVERNOIS
TROY, MI 48063

Robin R. Sanford
Sanford Bethune
3610 Shire Boulevard
Suite 206
Richardson, TX 75082

INVOICE NO. : 43311
INVOICE DATE: 5/03/2012
REPORTER:
Susan Castino

ID# 38-3263404

Nenad M. Kostic v. Texas A&M
University System, et al
16637

4/10/2012	Deposition of Christine Evans	
	Attendance of Reporter	165.00
	Original & One Copy	391.95
	E-Transcript	20.00
	Shipping & Handling	10.00
	Sub Total	586.95
	Paid	0.00
	Balance Due	586.95

THANK YOU FOR USING MEADOWBROOK COURT REPORTING

LATE FEE - \$15.00 ON BALANCE OVER 30 DAYS



INTEGRITY

legal support solutions

P.O. Box 245 | Manchaca, Texas 78652

INVOICE

Date	Invoice #
5/9/2012	9500.1

Bill To
Sanford Bethune Brian Sanford 3610 Shire Blvd., Suite 206 Richardson, Texas 75082

Cause No.
3:10-CV-02265-M
Style
Nenad M. Kostic vs. Texas A & M University at Commerce, et al.

All invoices are due and payable in Travis County, Texas.
Checks can be made payable to Integrity Legal Support Solutions, sent to the address listed above.
Tax ID No. 26-4073074 HUB No. 1201005853000

Terms
Prepayment

Date	Description
5/1/2012	Electronic Copy of Transcript - Nenad M. Kostic, Volume I Electronic Formatting Prepayment Handling Sales Tax - Non-Taxable Legal Services

Phone No.	Fax No.	Web Site	TOTAL
512-320-8690	512-320-8692	www.integrity-texas.com	\$527.10



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INTEGRITY

legal support solutions

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INVOICE

Date	Invoice #
7/6/2012	9676.1

Bill To
Sanford Bethune Brian Sanford 3610 Shire Blvd., Suite 206 Richardson, Texas 75082

Cause No.
3:10-CV-02265-M
Style
Nenad M. Kostic vs. Texas A & M University at Commerce, et al.

All invoices are due and payable in Travis County, Texas.
Checks can be made payable to Integrity Legal Support Solutions, sent to the address listed above.
Tax ID No. 26-4073074 HUB No. 1201005853000

Terms
Prepayment

Date	Description			
6/27/2012	Electronic Copy of Transcript - Nenad M. Kostic, Volume 2 Electronic Formatting Black and White Scanning CD - Scanned Exhibits Shipping/Handling - Prepayment Sales Tax - Non-Taxable Legal Services			
512-320-8690	512-320-8692	www.integrity-texas.com	TOTAL	\$751.60



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JANIS ROGERS
& ASSOCIATES
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SANFORD BETHUNE
3610 SHIRE BOULEVARD
SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120682
DATE:08/29/12

CC RT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF LARRY LEMANSKI	07/23/12	1THRAD	2138.10
TOTAL DUE			\$ 2,138.10

JANIS ROGERS
& ASSOCIATES
1545 WEST MOCKINGBIRD LANE
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DALLAS, TX 75235
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TAX I.D. NO. 75-2520745

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SANFORD BETHUNE
3610 SHIRE BOULEVARD
SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120683
DATE:08/29/12

RT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF GARY PEER	07/25/12	1THRAD	1093.50
TOTAL DUE			\$ 1,093.50

COURTHOUSE MULTIMEDIA

PO BOX 630483

IRVING, TX. 75063

(214) 417-4099

COURTHOUSEMULTIMEDIA@GMAIL.COM

Bill To:

BRIAN SANFORD

SANFORD BETHUNE

3610 SHIRE BLVD/SUITE 206

RICHARDSON, TX. 75082

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AUG 02 2012

3110

July 31, 2012

VIDEO PRODUCTION SERVICES FOR THE DEPOSITION OF LARRY LEMANSKI 7/23/12

TIME FRAME FOR PRODUCTION OF ORIGINALS 9:30 A.M. - 7:00 P.M.

9.5 HOURS @ \$98.00/HOUR

931.00

CONVERT ORIGINALS TO MPEG-1/BURN TO DVD

6 @ \$30.00/EACH

180.00

IN THE MATTER OF NENAD M. KOSTIC V. TEXAS A&M UNIVERSITY SYSTEM, ET. AL.

Total

\$1,111.00

JANIS ROGERS
& ASSOCIATES

PAGE 1

1545 WEST MOCKINGBIRD LANE
SUITE 1032
DALLAS, TX 75235
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SANFORD BETHUNE
3610 SHIRE BOULEVARD
SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120684
DATE:08/29/12

RT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF DAN RICHARD JONES	08/09/12	RUSHIJ	1537.50
TOTAL DUE			\$ 1,537.50

JANIS ROGERS
& ASSOCIATES
1545 WEST MOCKINGBIRD LANE
SUITE 1032
DALLAS, TX 75235
214/631-2655 FAX 214/631-2690
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AUG 21 2012

SANFORD BETHUNE
3610 SHIRE BOULEVARD
SUITE 206
RICHARDSON TX 75082

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20120657
DATE:08/16/12

COURT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF DR. MICHAEL D. McKINNEY	07/27/12	COPELJ	528.25
TOTAL DUE			\$ 528.25

P.O. Box 245 | Manchaca, Texas 78652

Date	Invoice #
9/23/2014	11586.1

Bill To
Sanford Bethune Brian Sanford 1910 Pacific Ave., Ste 15400 Dallas, Texas 75201

Cause No.
3;10-CV-02265-M
Style
Nenad M. Kostic vs. Texas A & M University at Commerce, et al.

Terms
Prepayment

Date	Description			
9/8/2014	Copy of Transcript - David Caldwell Black and White Scanning Exhibits Electronic Copy of Transcript/ASCII Shipping/Handling - Prepayment Sales Tax - Non-Taxable Legal Services			
Phone No.	Fax No.	Web Site	TOTAL	\$199.70
512-320-8690	512-320-8692	www.integrity-texas.com		



Pay online at: <https://ipn.intuit.com/6r8rmvg5>

PAGE 1

JANIS ROGERS
& ASSOCIATES
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214/631-2655 FAX 214/631-2690
TAX I.D. NO. 75-2520745

THE SANFORD FIRM
1910 PACIFIC AVENUE
SUITE 15400
DALLAS TX 75201

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20140712
DATE:12/11/14

COURT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
ORIGINAL DEPOSITION OF JAMES RANDY McBROOM	12/05/14	THRASD	1034.00
TOTAL DUE			\$ 1,034.00

PAGE 1

JANIS ROGERS
& ASSOCIATES
1545 WEST MOCKINGBIRD LANE
SUITE 1032
DALLAS, TX 75235
214/631-2655 FAX 214/631-2690
TAX I.D. NO. 75-2520745

THE SANFORD FIRM
1910 PACIFIC AVENUE
SUITE 15400
DALLAS TX 75201

ATT: BRIAN P. SANFORD

FILE #:

INVOICE FOR SERVICES RENDERED

JOB #:JRKOST.TEX00
NENAD M. KOSTIC V TEXAS A&M UNIVERSITY
SYSTEM, ET AL.

INVOICE #:20140713
DATE:12/11/14

COURT/CASE #:3:10-CV-02265-M

TERMS .0%/ 30

ACTIVITY DESCRIPTION/COMMENTS	DATE	REPORTER	AMOUNT
* FOR THE VIDEOTAPING OF THE DEPOSITION OF JAMES RANDY MCBROOM	12/05/14	BTVIDE	606.00
TOTAL DUE			\$ 606.00